



DECENTRALISED WATER CONSULTING

Southern Grampians Shire Domestic Wastewater Management Plan

Draft V5 Prepared for Southern Grampians Shire Council




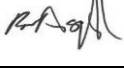

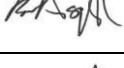

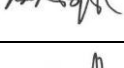




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DRAFT V5

EXECUTIVE SUMMARY

Southern Grampians Shire Council ('Council') are responsible for the approval and on-going oversight of on-site wastewater management systems (traditionally described as 'Septic Tanks' and more recently described as 'On-site Systems') within the Shire. On-site systems are the traditional method for managing sewage and other forms of wastewater on properties that are not connected to a Wannon Water reticulated (or town) sewerage system. They are also the preferred method of wastewater management for new developments in Low Density Residential, Rural Living and Rural Zones.

When designed, constructed and operated correctly, on-site systems can provide a safe, cost effective and sustainable wastewater management service. Unfortunately, not all on-site systems meet community expectations in this regard. This can occur due to a variety of factors including;

- Topography, soil and climate constraints (land capability constraints);
- Small lot size associated with older subdivisions;
- Older septic systems that discharge sewage off-site;
- A lack of management and maintenance;
- Septic systems incorrectly installed; and
- Wastewater load exceeding septic system capacity.

In some circumstances the impact of failing on-site systems can be significant, particularly with regards to risk to human health. Under the State Environment Protection Policy (Waters of Victoria or 'WOV') Council are required to prepare and implement a Domestic Wastewater Management Plan (DWMP). The State Environment Protection Policy (WOV) requires a DWMP to identify and prioritise wastewater risks in a local government area and develop actions to manage those risks.

What do Residents need to know about this Plan?

- Council is required to prepare a Domestic Wastewater Management Plan (DWMP) under the State Environment Protection Policy (Waters of Victoria). This DWMP must assess domestic wastewater (often referred to as on-site wastewater system or septic tank) risks in the municipality and develop prioritised actions to address potential impacts.
 - Specifically, Council are required to identify properties where wastewater is discharging off-site and develop actions to prevent this discharge from occurring.
 - This DWMP includes land capability hazard mapping that identifies the risk associated with on-site wastewater management on each property based on land capability and lot size.
-

- Investigations have also involved an evaluation of existing septic tanks and other on-site systems to identify high risk townships and areas.
- A number of townships have previously been identified by Council as high risk. Of these, Glenthompson and Penshurst have been identified (via a risk based prioritisation process) as two townships in need of improved or potentially alternative wastewater management strategies.
- There are a number of additional high risk areas along with isolated small lots that may also pose a risk of off-site discharge as there is insufficient land available for full on-site wastewater management.
- The majority of unsewered areas in Southern Grampians Shire are moderately well suited to on-site wastewater management subject to meeting the requirements of the EPA Code of Practice for On-site Wastewater Management.
- Domestic Wastewater Management Planning has included an evaluation of existing and potential future lot sizes in unsewered residential areas in conjunction with the broader planning controls.
- It is recommended that higher levels of scrutiny are applied to proposed unsewered developments proposing new allotments that are less than one hectare in size. The presence of constraints such as slope, gullies and watercourses can increase risk and limit options on lots below this size.
- The DWMP proposes a set of "Minimum Standards" for Land Capability Assessment and design information that needs to be submitted with Septic Tank or planning permit applications in unsewered areas classified as high risk.
- The DWMP also recommends that consideration be given to potential funding mechanisms for increased on-going oversight of on-site wastewater management system compliance.

The current progress of on-site system inspections and audits is summarised in the table below. To date, Council have currently collected system audit data for six townships as part of the Septic System Audit Program.

Table: Onsite System Inspection and Audit Progress

Townships in which Inspections / Audits have been undertaken	Audits / inspections currently proposed	Inspections / Audits to be undertaken
Penshurst Glenthompson Branxholme Balmoral Cavendish Hamilton (14 unsewered lots)	Tarrington	All other townships / localities

Revised Wastewater Management Risk Assessment

- A risk based mapping methodology has been applied across the Shire using GIS software (desktop based with groundtruthing). The mapping is based only on land capability and lot size constraints to installing an on-site system and **does not** currently include data on existing systems (type or performance). It is recommended that the Risk Mapping be used as a basis to determine requirements for further investigations into land capability and minimum lot sizes for any future development areas.
- Approximately 10% of properties are considered highly constrained or highly unlikely to be capable of safe and sustainable on-site wastewater management in the long-term.
- The typical unsewered lot size across Southern Grampians Shire is large to very large (average ~100ha), which is consistent with the low to moderate land capability hazard class identified for a reasonable proportion of properties (70%).
- System Audit Program data has currently been collected for Penshurst, Glenthompson, Branxholme, Balmoral, Cavendish and Hamilton (14 unsewered lots).
- Septic Tank Permit records available for approximately 1,100 on-site systems have been entered into the Council database. This is likely to be approximately 20% of total systems.

Table: Summary of Existing On-site Wastewater Management Systems in Southern Grampians (20% data coverage)

System Types	Number	Percentage
Primary Treatment (Septic Tank) – Unknown Land Application Method	754	68.7%
Primary Treatment - Trenches/Beds	5	0.5%
Sand Filter - Unknown	1	0.1%
Treatment Plant - Unknown	213	19.4%
Composting System / Worm Farm	10	0.9%
Split System	13	1.2%
Other	5	0.5%
Unknown	97	8.8%
Total	1,098	

- Majority of systems are traditional septic tank with an unknown method of disposal / land application.
 - Existing on-site systems that likely pose a significant risk to human health and the environment are in higher proportions in Glenthompson, Penshurst, Balmoral and Branxholme.
-

- While more traditional septic tank to absorption trench / bed systems can be a reliable and effective on-site wastewater management option, small property sizes in a number of unsewered areas in Southern Grampians Shire do not favour this approach.
- It is recommended that on-site wastewater management system (on-site system) data continue to be refined and developed to enable Council to maintain an active register of higher risk existing on-site systems.
- Branxholme Wastewater Feasibility Study was previously undertaken in 2013 and evaluated a number of potential options for servicing Branxholme township. Low pressure sewerage system was identified as the preferred option (subject to external funding – which has currently not been obtained). Upgrade of existing on-site wastewater systems identified as most cost effective option, however limitations with lots that cannot contain all wastewater on-site.
- Water quality monitoring findings for Branxholme Study were inconclusive given the lack of data and a formal monitoring strategy was identified as a requirement if further analysis was to be undertaken to confirm risk from on-site systems.
- A risk based prioritisation process has been undertaken based on a range of available data and this identified a number of high risk townships in the following order of priority – Glenthompson, Penshurst, Balmoral, Hamilton (Hiller Lane – 14 lots), Branxholme, Cavendish, Tarrington. A range of key actions have been proposed for both these townships along with localities / properties of lesser risk.
- There have recently been approximately 30-40 new unsewered allotments created per annum in Southern Grampians Shire which is a relatively modest number compared to other jurisdictions. However, many of these applications relate to township zoned properties that are below the recommended 4,000 m² property size and require Land Capability Assessment and careful design and installation.

Risk Based Prioritisation Process

A risk based prioritisation process has been undertaken by DWC to identify and rank higher risk villages / townships within Southern Grampians Shire. This process was utilised to rank villages / townships into “bands” of priority for further actions. These actions could include further system inspection / rectification or development of alternative wastewater management solutions.

Data confirming the type, age and condition of on-site systems in Southern Grampians Shire has been utilised where available, as Council have collected extensive data for a number of areas with historical issues from on-site wastewater systems. The prioritisation process consists of a multi-criteria analysis (MCA).

The results of this risk based assessment are summarised below. The focus of the figure below is ranking of the key high risk areas which have already been flagged by Council, and therefore have

area specific system inspection data (compliance and system type) from the System Audit Program (with the exception of Tarrington). It is recommended that inspections take place in Tarrington to fully populate this risk assessment. However it is unlikely to alter the ranking.

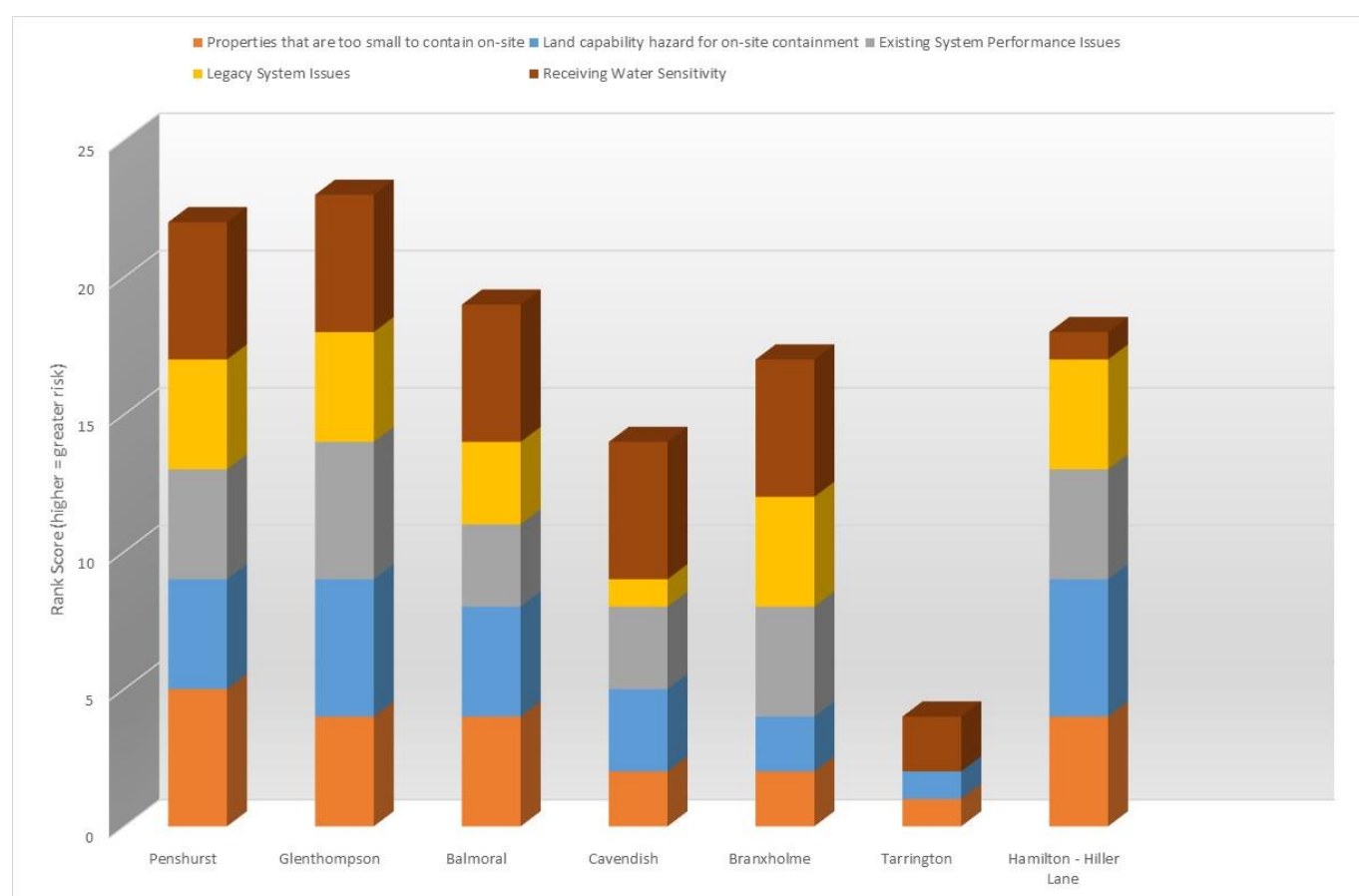


Figure: Results of Risk Based Prioritisation Assessment

Domestic Wastewater Management Action Plan

The revised risk assessment has been used to identify priority areas and properties for improved wastewater management. Where high proportions of properties are at risk of not containing wastewater on-site, priority actions focus on progressing strategies, potential management frameworks and funding models for some form of managed wastewater service. This Action Plan (summarised in **Section 6.2** of this document) has been developed within the existing constraints of legislation and state government policy relating to on-site systems, water authorities and land use planning.

In accordance with the SEPP (Waters), where it is not feasible for reticulated sewerage to be provided to a town or area that has been identified as high risk of non-containment, alternative risk management or mitigation strategies should be considered. They form a key component of this Action Plan.

For medium and lower risk areas / properties, actions focus on resourcing and implementing improved levels of oversight for on-site system operation and management. In addition, it is proposed to establish risk based Minimum Standards for Land Capability Assessment, system design and assessment of potential cumulative impacts for new systems and unsewered development to ensure future impacts are avoided.

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1 Introduction

Southern Grampians Shire Council ('Council') are responsible for the approval and on-going oversight of on-site wastewater management systems (traditionally described as 'Septic Tanks' and more recently described as 'On-site Systems') within the Shire. On-site systems are the traditional method for managing sewage and other forms of wastewater on properties that are not connected to a Wannon Water reticulated (or town) sewerage system. They are also the preferred method of wastewater management for new developments in Low Density Residential, Rural Living and Rural Zones.

When designed, constructed and operated correctly, on-site systems can provide a safe, cost effective and sustainable wastewater management service. Unfortunately, not all on-site systems meet community expectations in this regard. This can occur due to a variety of factors including;

- Topography, soil and climate constraints (land capability constraints);
- Small lot size associated with older subdivisions;
- Older septic systems that discharge sewage off-site;
- A lack of management and maintenance;
- Septic systems incorrectly installed; and
- Wastewater load exceeding septic system capacity.

In some circumstances the impact of failing on-site systems can be significant, particularly with regards to risk to human health. Under the State Environment Protection Policy (Waters of Victoria or 'WOV') Council are required to prepare and implement a Domestic Wastewater Management Plan (DWMP). The State Environment Protection Policy (WOV) requires a DWMP to identify and prioritise wastewater risks in a local government area and develop actions to manage those risks.

1.1 Purpose

This is a revision of the Southern Grampians Shire DWMP which was first developed and adopted in 2006. It also coincides with a recent update of the EPA *Code of Practice: On-site Wastewater Management* (2016) and a current review of the SEPP (WOV). In the thirteen years since the initial DWMP, there have also been a range of new technologies and approaches to on-site wastewater management.

The primary purpose of this DWMP is to:

- identify, assess and manage cumulative risks of onsite domestic wastewater systems discharging waste beyond allotment boundaries;
-

- engage with the Victorian Environmental Protection Authority (EPA) and Wannon Water to identify existing unsewered allotments for inclusion in the domestic wastewater management plan, which do not retain wastewater on-site or are not capable of preventing the discharge of wastewater beyond allotment boundaries, or preventing impacts on groundwater beneficial uses; and
 - identify, cost, prioritise and evaluate options to —
 - provide solutions to prevent discharge of wastewater beyond allotment boundaries; and
 - provide for the compliance assessment and enforcement of on-site domestic wastewater systems in accordance with the plan; and
 - where applicable have regard to the Guidelines for Planning Permit Applications in Open, Potable Water Supply Catchments and any relevant guidelines authorised by the EPA.
-

2 What do Residents need to know about this Plan?

- Council is required to prepare a Domestic Wastewater Management Plan (DWMP) under the State Environment Protection Policy (Waters of Victoria). This DWMP must assess domestic wastewater (often referred to as on-site wastewater system or septic tank) risks in the municipality and develop prioritised actions to address potential impacts.
 - Specifically, Council are required to identify properties where wastewater is discharging off-site and develop actions to prevent this discharge from occurring.
 - This DWMP includes land capability hazard mapping that identifies the risk associated with on-site wastewater management on each property based on land capability and lot size.
 - Investigations have also involved an evaluation of existing septic tanks and other on-site systems to identify high risk townships and areas. More data is required to enable these investigations to be incorporated into risk mapping.
 - A number of townships have previously been identified by Council as high risk. Of these, Glenthompson and Penshurst have been identified (via a risk based prioritisation process) as two townships in need of improved or potentially alternative wastewater management strategies.
 - There are a number of additional high risk areas along with isolated small lots that may also pose a risk of off-site discharge as there is insufficient land available for full on-site wastewater management.
 - The majority of unsewered areas in Southern Grampians Shire are moderately well suited to on-site wastewater management subject to meeting the requirements of the EPA Code of Practice for On-site Wastewater Management.
 - Domestic Wastewater Management Planning has included an evaluation of existing and potential future lot sizes in unsewered residential areas in conjunction with the broader planning controls.
 - It is recommended that higher levels of scrutiny are applied to proposed unsewered developments proposing new allotments that are less than one hectare in size. The presence of constraints such as slope, gullies and watercourses can increase risk and limit options on lots below this size.
 - The DWMP proposes a set of "Minimum Standards" for Land Capability Assessment and design information that needs to be submitted with Septic Tank or planning permit applications in unsewered areas classified as high risk.
 - The DWMP also recommends that consideration be given to potential funding mechanisms for increased on-going oversight of on-site wastewater management system compliance.
-

3 Background

Summary

- Systems with flow rates less than 5,000 litres a day are the responsibility of Council who issue permits for the construction, installation, and alteration of on-site systems.
- In 2018 the Victorian Auditor General's Office (VAGO) released the report titled *Managing the Environmental Impact of Domestic Wastewater*. Outcomes from this report coincided with the changes to the SEPP *Waters of Victoria* requiring councils to address some of these identified issues. The DWMP Risk Assessment and Action plan have been described and developed in line with these changes and outcomes.
- The Southern Grampians Planning Scheme has been considered in developing this DWMP with a focus on areas identified for current and future residential development.
- For Council to consider a planning permit application for development including subdivision in the absence of a reticulated sewerage system, a land capability assessment proving that the land is capable of treating and retaining wastewater within the allotment boundaries is required.
- Integrated Water Management (IWM) approaches and concepts are to be investigated as part of this DWMP. SGSC is a member of the recently established 'Great South Coast' IWM Forum and have been in discussions with Wannon Water around alternative approaches to wastewater management for high priority areas.

Council is responsible under the *Environment Protection Act (1970)* for the approval of on-site wastewater management systems (on-site systems or 'septic systems'). This includes the approval of alterations to existing systems and consideration of wastewater management risks associated with new unsewered development. The Southern Grampians Planning Scheme include reference to the relevant provisions of the *Environment Protection Act* and require consideration of the capability to contain wastewater within property boundaries when approving new development.

Council is required to ensure existing on-site systems do not adversely impact on human health or the environment under the *Health and Wellbeing Act (2008)* and *State Environment Protection Policy (Waters of Victoria)*. This has historically proven to be a challenging outcome for local councils to achieve due to constraints in the ability to resource oversight and enforce upgrades to failing or inappropriate systems.

3.1 Victorian Context

The following legislation is relevant to Domestic Wastewater Management in Victoria and has been considered in the development of this plan.

Local Government Act 1989

The Local Government Act (1989) provides a framework for the establishment and operation of Councils. This includes planning and providing services and facilities to local communities (including domestic wastewater management), making and enforcing local laws and exercising, performing and discharging the duties, functions and powers of Councils under this Act and other Acts.

Environment Protection Act 1970

The purpose of this Act is to create a legislative framework for the protection of the environment in Victoria which are to be enacted upon by the Environment Protection Authority (EPA). Some of these duties are delegated to local councils. Part IXB of the Act provides the basis of the regulatory framework for septic tank systems and identifies the requirement for a permit to construct, install or alter a septic system. Permit application requirements, grounds for application refusal and septic tank maintenance requirements are also outlined under this Part of the Act.

Water Act 1989

This Act provides a formal means to protection and enhancement of the environmental qualities of waterways and catchments and aims to eliminate inconsistencies in the treatment of surface and groundwater resources and waterways. Part 3 (Assessment of and Accounting for Water) of the Act identifies that the water resources assessment program must include an analysis the disposal of wastewater. This includes the collection, collation, analysis and publication of information about on-site wastewater management systems.

Planning and Environment Act 1987

The key legislation relating to land development in Victoria is the Planning and Environment Act 1987. The two objectives of the planning framework under the Act are;

- To enable land use development and planning and policy to be easily integrated with environmental conservation and resource management policies; and
- To ensure that the effects on the environment are considered when decisions are made about the use and development of land.

Public Health and Wellbeing Act 2008

The objective of this Act is to achieve the highest attainable standard of public health and wellbeing by;

- Protecting public health and preventing disease, illness, injury, disability or premature death;
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- Promoting conditions in which persons can be healthy; and

Reducing inequalities in the state of public health and wellbeing. Under Division 1, Part 6 of the Act, Councils have a duty to remedy as reasonably possible all existing nuisances, whereby nuisances are (or a liable to be) dangerous to health or offensive. As such, if an on-site wastewater system is or has the ability to cause/become a nuisance, Council has a duty to rectify the existing / possibly threat to human health.

State Environmental Protection Policy (Waters)

This Policy provides a framework to protect and improve the quality of Victoria's waters with regard to the environmental protection principles set out in the Environment Protection Act (1970). Where reticulated sewerage is not reasonably practical (for singular and subdivision sites), Council must ensure that sewage can be sustainably managed within property boundaries. Under Part III (Division 1) of the Policy, Councils are to develop a Domestic Wastewater Management Plan that identifies the public health and environmental risks associated with on-site domestic wastewater management and outlines strategies to manage those risks. The policy also directs municipalities to utilise the Environment Protection Authority Code of Practice for Onsite Wastewater Management (EPA Publication 891.4 Dec 2016).

The Environment Protection Authorities Code of Practice for Onsite Wastewater Management provides standards and guidance to ensure the management of on-site wastewater protects public health and the environment for wastewater flows up to 5,000L/day. This code is the Victorian guideline for best practice management of on-site wastewater systems and land capability assessments. The code states that Councils need to assess the suitability of land for on-site wastewater management to ensure that permits are consistent with the guidelines of the code and outlines key obligations for Councils and occupiers of premises.

The State Environment Planning Policy (SEPP) *Waters of Victoria* has recently undergone a review and has recently been gazetted (now known as SEPP – Waters). Therefore there is a need to review the domestic wastewater management elements of the SEPP in relation to Southern Grampians Shire. This review involves a consolidation of the current SEPP (Waters of Victoria) and SEPP (Groundwaters of Victoria).

Other relevant legislation includes;

- Safe Drinking Water Act 2003 and Regulation 2005
 - Catchment and Land Protection Act 1994
 - Victorian Building Regulations 2006
-

The design, operation and management of on-site systems are supported by a number of standards and guidelines. Namely:

- EPA Code of Practice – Onsite Wastewater Management, Publication 891.4 (2016);
- MAV Land Capability Assessment Framework (2014) – replacing EPA Publication 746.1;
- AS/NZS 1547:2012 Onsite Domestic Wastewater Management (updated since last DWMP);
- AS/NZS 3500:2003 Plumbing and Drainage; and
- Guidelines – Planning Permit Applications in Open, Potable Water Supply Catchment Areas (DSE, 2012) – released since last DWMP.

Note: Since July 2016 EPA no longer award a Certificate of Approval to individual on-site wastewater systems. EPA now approves four system types in line with Australian Standards;

- AS/NZS 1546.1 Septic tanks
- AS/NZS 1546.2 Waterless composting toilets
- AS/NZS 1546.3 Aerated wastewater treatment systems
- AS/NZS 1546.4 Domestic greywater treatment systems (draft)

Council Officers can only approve the installation of an on-site wastewater system that is certified to comply with the relevant Australian Standard by an accredited conformity assessment body (CAB). As part of a permit application to council, the applicant will need to include a copy of the certificate of conformity from a CAB.

3.1.1 VAGO Audit of Domestic Wastewater Management

In September 2018 the Victorian Auditor General's Office (VAGO) released the report titled *Managing the Environmental Impact of Domestic Wastewater*. This audit focused on two metropolitan councils and water authorities as case studies. However, many of the outcomes are relevant state wide and specifically to Southern Grampians Shire Council (SGSC). Key outcomes included.

- an overly complex, onerous and duplicative regulatory framework
 - a continued lack of clarity around roles and responsibilities
 - regulatory barriers and gaps in governance and approval processes are hindering the timely implementation of alternative management approaches to sewer.
 - regulatory tools that do not adequately drive property owners' compliance with planning permits and legislation
 - significant information gaps across a whole range of important on-site wastewater management strategies
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- lack of a consistent, robust and transparent risk assessment process.
- Lack of systematic inspection / oversight program
- councils not being held to account for their role in domestic wastewater management.

These outcomes coincided with the changes to the SEPP requiring councils to address some of these issues. The DWMP Risk Assessment and developed Action plan have been described and incorporated into the documents.

3.2 Status of Domestic Wastewater Management in Southern Grampians Shire

Council's Environmental Health Coordinator is responsible for the regulatory oversight of Domestic Wastewater within SGSC. This includes working with Council's Planning Department to ensure wastewater risks are adequately considered during land use planning and approval processes.

Consideration has been given to the following SGSC plans and policies during this DWMP review.

- Southern Grampians Shire Council Plan 2017-2021
- Strategic Resource Plan 2018 – 2022
- Southern Grampians Shire Council Sustainability Strategy 2010 – 2020 (specifically water and wastewater management chapter)
- Southern Grampians Shire Council Health and Wellbeing Plan 2017-2021
- Southern Grampians Shire Council Climate Change Adaption Plan 2017-2027
- Community and Structure Plans for key unsewered townships / villages (Balmoral, Branxholme, Cavendish, Glenthompson and Penshurst).

How Are On-site Wastewater Systems Currently Managed in Southern Grampians?

3.2.1 Approval of New Unsewered Development / On-site Systems

Currently, on-site systems that manage or are designed to manage flow rates of more than 5,000 litres per day are regulated by EPA through works approvals and, in some cases, operating licences.

Systems with flow rates less than 5,000 litres a day are the responsibility of Council which issue permits for the construction, installation, and alteration of on-site systems. Council may refuse a permit if the site of the proposed system or proposed effluent land application is considered unsuitable and must refuse if the type of system is not approved by EPA.

Land use planning context is discussed below.

3.2.2 Management of Existing On-site Systems

Council are to enforce action for any system in which a permit was not obtained or if the conditions of the permit have been breached.

Council collect data and information on existing on-site systems across the Shire to help identify issues (particularly in higher risk areas) that require action. These include;

- Septic Permit status and on-site system inspection and audit information (refer Section 5.3)
- Water quality monitoring data (refer Section 5.5)
- Complaints from residents (system failures)

The current progress of on-site system inspections and audits is summarised in the table below. To date, Council have collected system audit data for six townships as part of the Septic System Audit Program. An intention of this DWMP is to provide guidance on higher priority localities which require collection of data as part of the System Audit Program.

Table 1 Onsite System Inspection and Audit Progress

Townships in which Inspections / Audits have been undertaken	Audits / inspections currently proposed	Inspections / Audits to be undertaken
Penshurst Glenthompson Branxholme Balmoral Cavendish Hamilton (14 unsewered lots)	Tarrington	All other townships / localities

3.3 Land Use Planning Context

The Southern Grampians Planning Scheme has been considered in developing this DWMP with a focus on areas identified for current and future residential development.

For Council to consider a planning permit application for development including subdivision in the absence of a reticulated sewerage system, a land capability assessment proving that the land is capable of treating and retaining wastewater within the allotment boundaries is required.

The Southern Grampians Planning Scheme prescribes minimum lot size thresholds for development within particular zones as follows;

- Low Density Residential Zone (LDRZ) – 4,000m² to 1 hectare (depending on area / Schedule)
- Rural Living Zone (RLZ) – 2 hectares (6 hectares for two lots in Tarrington)
- Farming Zone (FZ) – 40 hectares (2 hectares for land subject to Schedule 5 of the Development Plan Overlay)

- Rural Conservation Zone (RCZ) – 40 hectares

In the Township Zone (TZ) a lot may be used for a dwelling provided each dwelling is connected to reticulated sewerage. If reticulated sewerage is not available, all wastewater from each dwelling must be treated and retained within the lot in accordance with the State Environment Protection Policy (Waters of Victoria) under the *Environment Protection Act 1970*.

For subdivision in the TZ, each proposed lot must be provided with reticulated sewerage, if available. If reticulated sewerage is not available, the planning permit application must be accompanied by:

- A land capability assessment which demonstrates that each lot is capable of treating and retaining all wastewater in accordance with applicable state policy, regulation and legislation, and
- A plan which shows the building envelope and effluent disposal area for each lot.

The Bushfire Management Overlay (BMO) applies to land across the Shire with the key purpose to ensure the development of land prioritises the protection of human life and strengthens community resilience to bush fire. It has potential impacts for on-site wastewater management systems on unsewered properties. The land capability hazard mapping (discussed in Section 5.2) provides an indication of overall constraints to on-site wastewater management and therefore provide supporting information to be considered in combination with BMO.

There is no Erosion Management Overlay (EMO) for the Shire, however slope and landslip risk (assessed on a site specific basis) is also a recognised constraint to development that can have a significant influence on the ability to contain on-site. This has been included in the onsite hazard mapping (however it was not a major constraint).

The Environmental Significance Overlay (ESO) applies to land across the Shire identifying land where the development of land may be affected by environmental constraints such as proximity to waterways. The ESO ensures that development is compatible with identified environmental values including the Wannon River escarpment and protection of waterways.

The Vegetation Protection Overlay (VPO1) applies to land across the Shire with the purpose of protecting areas of significant vegetation and ensuring development minimises loss of vegetation.

3.3.1 Undevelopable Lots

A key consideration for this Plan was the number of 'paper lots' scattered across the Shire. These are historical allotments which were previously approved but cannot be developed in the current planning context. An area of note is Mirranatwa which has approximately 150 'paper lots' which are less than <2,000m² each and are therefore not developable, given it is well below the minimum lot size for unsewered development. Council wish to provide better guidance to the community regarding the status of existing on-site wastewater systems (if any) and lot development potential, particularly with regard to these paper lots.

Council also wish to use the risk assessment and mapping prepared as part of this DWMP to identify allotments they wish to see consolidated. This is particularly the case for separate adjacent allotments with the same owner, in which the existing on-site system is located on one lot and the dwelling (connected to the system) is located on the other.

3.4 Integrated Water Management

Integrated Water Management (IWM) aims to provide a holistic and forward thinking approach to all elements of the water cycle (movement of water through its various phases) including wastewater in addition to stormwater, potable / non-potable water supply and local watercourses. The intention is for this approach to be adaptive to temporal changes over the long-term and designed in conjunction with end users (community) with a place based element to design.

The recently developed IWM Framework (DELWP, 2017) is aimed at assisting government agencies and the community in planning and implementation of these IWM concepts / options in the future. This includes the establishment of a number of new Victorian IWM Forums. SGSC is a member of the recently established 'Great South Coast' IWM Forum and SGSC have been in discussions with Wannon Water around alternative approaches to wastewater management for high priority areas.

4 Review of 2006 Domestic Wastewater Management Plan

The 2006 DWMP was developed as part of a regional project that included Moyne and Warrnambool Shire Council's. Being the first DWMP for the Shire, much of its focus was on the documentation of existing wastewater management practices and procedures in addition to a qualitative evaluation of the key issues in high risk towns. There have been significant changes in the following areas in the ensuing 13 years.

- On-site and decentralised wastewater management technologies and management approaches.
- Victorian and national guidelines and standards pertaining to on-site wastewater management.
- Victorian and national policy and research into Integrated Water Management and Water Sensitive development.
- The availability of funding through the Victorian Country Towns Water Supply and Sewerage Program has since ceased.

As a result, Council has decided that a wholesale review of the DWMP is warranted. Notwithstanding, a number of Actions from the 2006 DWMP were implemented and have directly contributed to, and informed this revised Plan. Of particular value were the outcomes of the township inspections and audits which have provided site specific data to populate the Domestic Wastewater Risk Assessment. The following table contains a summary of progress in implementation of the Action Plan from the

2006 DWMP in addition to details on how this action has informed or been carried into this Plan revision.

Table 2 Implementation Progress for the 2006 DWMP

Action	Status	Details
Objective 1 – To ensure that there are suitable standards, codes of practice and legislation in place to allow Council to effectively manage domestic wastewater management systems	Limited (statewide) progress.	<p>Many of the same challenges documented in the 2006 DWMP remain with respect to legislative constraints.</p> <p>Council provided feedback to Waters SEPP review in 2015, EPA Enquiry in 2016 & Water Policy 2016.</p> <p>Council is a member of Municipal Association of Victoria (MAV) Onsite Domestic Wastewater working (ODWW) Working Group. MAV ODWW Group is liaising with EPA and DWELP in the development of subordinate legislation for EPA Act 2018.</p>
Objective 2 – To ensure that Council's planning and approval process are clearly understood by and complied with by all parties	Council advice is that documented objectives have been improved upon significantly.	<p>Has not addressed external challenges (e.g. LCA Assessor, installer) in a formal, structured manner.</p> <p>This DWMP revision includes Minimum Standards for the approval of on-site systems and unsewered development based on risk.</p>
Objective 3 – To effectively manage all plans and other information associated with individual septic tank systems	Partially complete	<p>Entry of Septic Permit & existing septic systems data into Health Manager septic register has been on-going.</p> <p>Scanning Septic Permit & existing septic systems documentation into Council electronic record system HP has been on-going since 1999.</p> <p>Resource intensive and limited to available permit data. Process to continue in revised DWMP period.</p> <p>Some properties will require inspection to confirm details.</p>
Objective 4 – To ensure that all parties involved in domestic wastewater management are appropriately informed about their responsibilities, how the systems works and any risks associated with the systems	<p>Informal community education has occurred.</p> <p>Transfer of title notifications not implemented.</p>	<p>Education sessions have been undertaken with the community and wastewater consultants / plumbers / installers / service agents / builders.</p> <p>This has included presentations at builders information sessions and community sessions on the outcomes of the Audit Program on-site inspections. Septic education awareness is provided to owners / occupiers / plumbers / service agents during septic onsite inspections, during Septic Permit and Planning Permit process.</p> <p>Council's website has been updated in recent years to explain the Septic Tank Permit Process, buying an unsewered property and copy of all of the township septic system inspection program reports and presentations.</p> <p>Copies of Septic Permit Approval To Install and Certificate To Use provided to Septic Permit applicant, owner, plumber and Building Certifier. The potential for a transfer of title check or certificate will be considered in this plan.</p> <p>Options for incorporating on-site education into an inspection program being considered.</p>

Action	Status	Details
Objective 5 – To address immediate concerns about problematic systems and ensure that systems generally operate effectively	5a; On-going 5b-d: Not implemented	Letters sent to properties within audited towns notifying them of required actions. Enforcement action for significant health risks. Broader oversight and management programs not implemented. Unable to resource (costs underestimated).
Objective 6 – To address specific wastewater problems in each township	Detailed audits for four towns completed.	Letters sent to properties within audited towns notifying them of required actions. Enforcement action for significant health risks. Some water quality monitoring and follow up inspections completed (resource constrained). Broader solutions not implemented (resource constrained).
Objective 7 – To fully understand the important characteristics of each town which	Initiated but not completed	Full standardised on-site wastewater risk mapping prepared as part of this DWMP revision.
Objective 8 – To ensure that Council's significant land use plans take into consideration the findings and directions of the domestic waste water management plan	Achieved	Structure Plans (Tarrington, Hamilton and Dunkeld) include specific consideration of wastewater management constraints and recommend strategies to overcome them.
Objective 9 – To ensure that the resources implication of implementing the plan are understood and addressed	Not achieved	No special charge was previously implemented or approved.
Objective 10 – To investigate the feasibility of introducing other regimes for domestic wastewater management	No significant progress	Issue has been raised at a state government level recently as part of a legislative review.
Braxholme Sewage and Wastewater Feasibility Study	Undertaken 2013	Evaluated a number of potential options for servicing Braxholme township. Low pressure sewerage system was identified as the preferred option (subject to external funding – which has currently not been obtained). Upgrade of existing on-site wastewater systems identified as most cost effective option, however limitations with lots that cannot contain all wastewater on-site. Some water sampling undertaken as part of this study (discussed in Section 5.5).

5 Revised Wastewater Management Risk Assessment

Key Findings / Outcomes

- A risk based mapping methodology has been applied across the Shire using GIS software (desktop based with groundtruthing). The mapping is based only on land capability and lot size constraints to installing an on-site system and **does not** currently include data on existing systems (type or performance).
- Approximately 10% of properties are considered highly constrained or highly unlikely to be capable of safe and sustainable on-site wastewater management in the long-term.
- The typical unsewered lot size across Southern Grampians Shire is large to very large (average ~100ha), which is consistent with the low to moderate land capability hazard class identified for a reasonable proportion of properties (70%).
- System Audit Program data has currently been collected for Penshurst, Glenthompson, Branxholme, Balmoral, Cavendish and Hamilton (14 unsewered lots).
- Septic Tank Permit records available for approximately 1,100 on-site systems have been entered into the Council database. This is likely to be approximately 20% of total systems.
- Majority of systems are traditional septic tank with an unknown method of disposal / land application.
- Existing on-site systems that likely pose a significant risk to human health and the environment are in higher proportions in Glenthompson, Penshurst, Balmoral and Branxholme.
- While more traditional septic tank to absorption trench / bed systems can be a reliable and effective on-site wastewater management option, small property sizes in a number of unsewered areas in Southern Grampians Shire do not favour this approach.
- It is recommended that on-site wastewater management system (on-site system) data continue to be refined and developed to enable Council to maintain an active register of higher risk existing on-site systems.
- Branxholme Wastewater Feasibility Study undertaken in 2013. Water quality monitoring findings were inconclusive given the lack of data and a formal monitoring strategy was identified as a requirement if further analysis was to be undertaken to confirm risk from on-site systems.
- A risk based prioritisation process has been undertaken based on a range of available data and this identified a number of high risk townships in the following order of priority – Glenthompson, Penshurst, Balmoral, Hamilton (Hiller Lane – 14 lots), Branxholme, Cavendish, Tarrington. A range of key actions have been proposed for both these townships along with localities / properties of lesser risk.
- There have recently been approximately 30-40 new unsewered allotments created per annum in Southern Grampians Shire which is a relatively modest number compared to other jurisdictions. However, many of these applications relate to township zoned properties that are below the recommended 4,000 m² property size and require Land Capability Assessment and careful design and installation.

The risk assessment completed in 2006 was a largely qualitative evaluation based on limited available data. Best practice DWMP risk assessment involves a number of more quantitative methods to identify the presence, likelihood and magnitude of any risk factors associated with on-site wastewater management. Council have recently been actively working to review and collate Septic Tank Permit data into their Environmental Health and property databases which has improved issues around data availability.

In addition, the availability of more comprehensive Geographical Information System (GIS) data has also created opportunity for a spatial risk assessment to be undertaken. This includes consideration of cumulative impacts from both existing on-site wastewater systems and potential unsewered subdivisions.

There are two components to the DWMP Risk Assessment. The assessment has been completed using a Land Capability Hazard / Containment Framework developed by DWC in conjunction with Yarra Valley Water that applied the legislative and EPA Code of Practice definition and principles for on-site containment in a spatial (GIS) framework. The Framework has been slightly modified in the context the Southern Grampians Shire DWMP but remains consistent with other DWMP risk mapping prepared for other councils.

The first component is the preparation of a broad scale land capability hazard or risk map;

- to ensure future development is sustainable;
- to recognise where past development practices prevent safe and sustainable DWM; and
- to identify areas where the environment may be sensitive to DWM impacts and requires special protection.

The second component is an infrastructure based assessment (looking at existing on-site systems);

- to identify risks associated with older, inappropriate DWM technologies or approaches (such as direct off-site discharge);
- to geographically identify areas where there are a high number of off-site discharge or failing systems.

There are some areas in the shire where both land capability constraints (such as slope, poor soils or proximity to waterways) and the presence of older off-site discharge systems combine to create significant immediate risks and place limits on the feasibility of achieving adequate levels of health and environmental protection with on-site systems. An example is the Penshurst township.

The DWM risk assessment process has identified these high risk areas and developed recommended strategies for alternative wastewater management. This can range from traditional reticulated sewerage to improved / managed DWM programs.

5.1 Review of Available Data and Information

Data were sourced from both Southern Grampians Shire Council and the Victorian Government online data portal for undertaking the onsite hazard mapping for the Southern Grampians Shire. These data are summarised in the following table.

Table 3 Summary of Available Data and Sources

Data	Description	Source
Topographic / Elevation Data	Contours (2m) were available for the Shire. Contours and slope grid were created within QGIS based on the Vicmap 20m Digital Terrain Model (DTM) which provides consistent coverage across the entire Shire (10m DTM only covered part of the northern section of Shire).	Victorian Government / SGSC
Ortho-photography	High resolution ortho-photography tiles for the entire Shire (from 2016).	Southern Grampians Shire Council
Soil type (landscape) data	Soil landscape mapping for the Glenelg Hopkins region (1:100,000 scale). Geomorphology (GMU) layer for Victoria	Department of Economic Development, Jobs, Transport and Resources (previously DEPI) Vic Gov data portal
Watercourses (All)	State-wide watercourse (hydroline) layer – 1:25,000 scale trimmed to Shire. Used to define both partially vegetated / rehabilitated intermittent drainage lines and permanent watercourses.	Victorian Government data portal
Hydroareas (waterbodies)	State-wide waterbodies layer trimmed to Shire. Used to define farm dams and other larger waterbodies.	
Groundwater bores	Groundwater bore locations and available data (potable / non-potable).	BoM Australian Groundwater Explorer online mapping (http://www.bom.gov.au/water/groundwater/explorer/map.shtml)
Planning Overlay	Planning overlay used to isolate Environmental Significant Overlay (ESO), Floodways / Land Subject to Inundation and Bushfire Management Overlay (BMO). Specific flooding layers also provided by Council.	Victorian Government data portal
Bio Region Conservation Areas	Bio-conservation vegetation layer used to define environmentally significant vegetation (in combination with ESO layer). <i>Native Vegetation - Modelled 2005 Ecological Vegetation Classes (with Bioregional Conservation Status) - NV2005_EVCBCS</i> layer utilised.	Victorian Government data portal
Property boundaries	Cadastral boundaries for current properties across Southern Grampians Shire.	Victorian Government data portal

Data	Description	Source
Stormwater Drainage	Stormwater drainage data available, however Council confirmed it is of highly variable quality / accuracy and completeness. Not used within mapping for this reason.	-
Erosion Management Overlay (EMO)	Erosion Management Overlay which identifies areas in which a geotechnical assessment is required to ensure landslip is not a risk. There is no EMO for the Shire and landslip is assessed on a site specific basis (not a key constraint in Shire).	Victorian Government data portal
Sewer alignment	Alignment data provided to determine unsewered properties (as best as possible).	Wannon Water

Key guidelines and sources of criteria for the mapping are summarised in Table 4.

Table 4 Guidelines / Standards: On-site Wastewater Risk Framework

Organisation	Resource	Purpose
Victorian government	SEPP (WoV)	Overarching regulatory performance objectives relating to protection of surface waters. Regulatory performance objectives with respect to protection of groundwater beneficial uses.
EPA Victoria	EPA Code of Practice (CoP) – On-site Wastewater Management (2016)	Sets out specific means of compliance recognised as “deemed to comply” with the SEPP. Setback distances adopted for risk classification Framework.
MAV	Victorian Land Capability Framework (2014)	Documents the state government endorsed land capability hazard framework for on-site wastewater management in Victoria. Used as the basis for the land capability elements of the risk classification.
Standards Australia	ASNZS1547:2012 On-site domestic wastewater management	Provides additional design, siting and operational guidance that has been applied within the risk classification Framework.

5.2 On-site Containment / Land Capability Hazard Mapping

DWC has previously developed an agreed definition of on-site containment as part of the Park Orchards Trial project (on behalf of Yarra Valley Water). This definition took the legal terminology from the SEPP (WoV) “*containment of effluent within the boundaries of the allotment and protection of any beneficial uses of groundwater*” and translated that initially into measurable hydraulic, nutrient and pathogen performance targets that can be validated through field monitoring and numerical modelling. This work confirmed that an effluent Land Application Area (LAA) that has been sized to the most limiting of a water, nitrogen or phosphorus balance (as per the MAV Land Capability

Assessment Framework – 2014) and meets standard setback distances to sensitive receptors (from the EPA Code of Practice) can be considered capable of on-site containment.

As part of this DWMP, DWC has evaluated a range of on-site LAA design scenarios in addition to typical levels of development on unsewered properties to nominate a series of property size ranges that represent increasing levels of containment on-site (CoS) potential. These on-site containment criteria are proposed as a *conservative benchmark* to ensure on-site systems to not pose a risk to human health and the environment with all wastewater contained on-site. Appendix C outlines previous minimum lot size and cumulative impact data analysis undertaken by DWC which has been utilised to support these lot ranges.

Table 5 On-site Containment Lot Size Criteria

Lot Size Criteria	On-site Containment Capacity
<2,000 m ²	<p>Generally not capable of on-site containment: Properties under 2,000 m² do not typically have sufficient available area to fit an adequately sized on-site system for a contemporary dwelling (e.g. a 4-5 bedroom house) whilst meeting recommended setback distances to waterways, groundwater bores and other sensitive receiving environments.</p> <p>Partial or full off-site wastewater management is the preferred strategy for these properties (e.g. reticulated sewerage, cluster system or centrally / authority managed on-site systems). Where owner managed on-site systems are the only available option, specialist design will be required along with increased oversight in order to achieve containment.</p>
2,001 m ² – 3,999 m ²	<p>Detailed Land Capability Assessment required to confirm ability to contain on-site: Properties in this size range are likely to have sufficient available area to fit an adequately sized on-site system for a contemporary dwelling (e.g. 4-5 bedroom house). However, this will be highly dependent on-site specific land capability constraints and proximity to sensitive receiving environments. A more detailed LCA and design process is likely to be required to ensure full containment in addition to higher level treatment and greater construction and operational oversight.</p> <p>Where possible these properties should be considered for partial or full off-site wastewater management (e.g. reticulated sewerage, cluster system or centrally / authority managed on-site systems). Where owner managed on-site systems are the only available option, increased regulatory oversight is strongly recommended in order to ensure containment.</p>
≥ 4,000 m ²	<p>Generally capable of full on-site containment: Owner managed on-site systems are the appropriate wastewater servicing strategy for most properties of this size (subject to site specific land capability constraints). Cumulative impacts are negligible where EPA setback distances are met.</p>

These definitions relate to the *long-term sustainability* of on-site wastewater management. For properties greater than 2,000 m², consideration must also be given to land capability constraints such as soil characteristics, slope, landslip and proximity to creeks, drains and groundwater bores. To address this, DWC have also completed a GIS based broad scale Land Capability Assessment (LCA) of unsewered properties in the Southern Grampians Shire.

This LCA is consistent with the EPA CoP (2016) and the MAV Land Capability Assessment Framework (2014) with a detailed methodology provided in Appendix A. A summary of the hazard classes and what they mean is provided in Table 6 below.

Table 6 Land Capability Hazard Map Summary

Classification	CoS?	EPA CoP?	Derivation	Description
Low Risk / Hazard	Likely (Refer Table 5)	Yes	Final Risk Score <1	Few/minor constraints to on-site wastewater management and low risk receiving environment. Periodic (e.g. 3 years) oversight as per current Septic Tank Permit conditions likely to manage risk.
Medium Risk / Hazard			Final Risk Score 1 < > 2	Individual and/or cumulative hazards slightly elevate the likelihood and/or consequence of on-site system failure. A higher level of design, construction, maintenance and oversight (e.g. annual inspection) input may be necessary to manage risk and meet regulatory objectives for health and ecosystem protection.
High Risk / Hazard			Final Risk Score >3	Individual and/or cumulative hazards significantly elevate the likelihood and/or consequence of on-site system failure. Best practice design, construction, maintenance and oversight essential to manage risk and meet regulatory objectives for health and ecosystem protection.
Very High Risk / Hazard	TBC On-site (Refer Table 5)	Very constrained (MAV, 2014)	Slope >30% (on average) / landslip risks	Significant Land Capability constraints (steep slope / landslip risk) across the majority of suitable land available within the property. On-site containment may be possible subject to advanced engineering and oversight where the provision of an off-site solution is cost prohibitive.
Non CoS	Unlikely (Refer Table 5)	No	Lot size < 2,000m ²	Generally no suitable land available for CoS. Full off-site solution is highly likely to meet the objectives of the SEPP.

After the development of the broad scale land capability hazard map, lot size was utilised to determine likely potential for containment on-site (CoS) for each property as outlined in Table 5. This resulted in an overall Land Capability Hazard Class for each lot.

The following logic was applied to all unsewered lots to develop the final Land Capability Hazard Class.

- Lot size <2,000m² = Non CoS Classification (regardless of land capability);
- Lot size 2,001 m² – 3,999 m² = Greater of High Hazard or land capability hazard (as per mapping);

- $\geq 4,000 \text{ m}^2$ = Land capability hazard used (as per mapping).

The Wastewater Land Capability Hazard Map is presented below (Figure 5-1) along with close up maps of key unsewered areas across Southern Grampians Shire (Figure 5-2 to 5-7). The mapping is currently based on property (not allotment / parcel) boundaries as the intention of the DWMP is to focus on existing on-site systems within properties and the potential risks they pose.

Table 7 presents a breakdown of the hazard class for unsewered properties in Southern Grampians Shire. These numbers are approximate as they may include some unsewered properties that are currently vacant / undevelopable. Sewerage alignment data was utilised to isolate properties that are serviced by reticulated sewer. However a small number of sewer property may still be present in the hazard mapping of unsewered lots. As can be seen a large proportion are classified Low to Medium Hazard across the Southern Grampians Shire.

Table 7 Land Capability Hazard Breakdown

Hazard Class	Southern Grampians Shire
Low Hazard	1,563 (24%)
Medium Hazard	2,990 (46%)
High Hazard	1,243 (19%)
Very High Hazard	2 (0%)
Non CoS	671 (10%)
Total	6,470

It can be seen that the majority of the unsewered properties in Southern Grampians Shire are capable of achieving on-site containment *subject to design, installation and operation of an on-site wastewater management system that meets the EPA CoP*. Approximately 19% of properties are likely to be capable of on-site containment but feature one or more significant constraints that may require more detailed LCA, design, installation and operational input. **Approximately 10% of properties are considered highly constrained or highly unlikely to be capable of safe and sustainable on-site wastewater management in the long-term.**

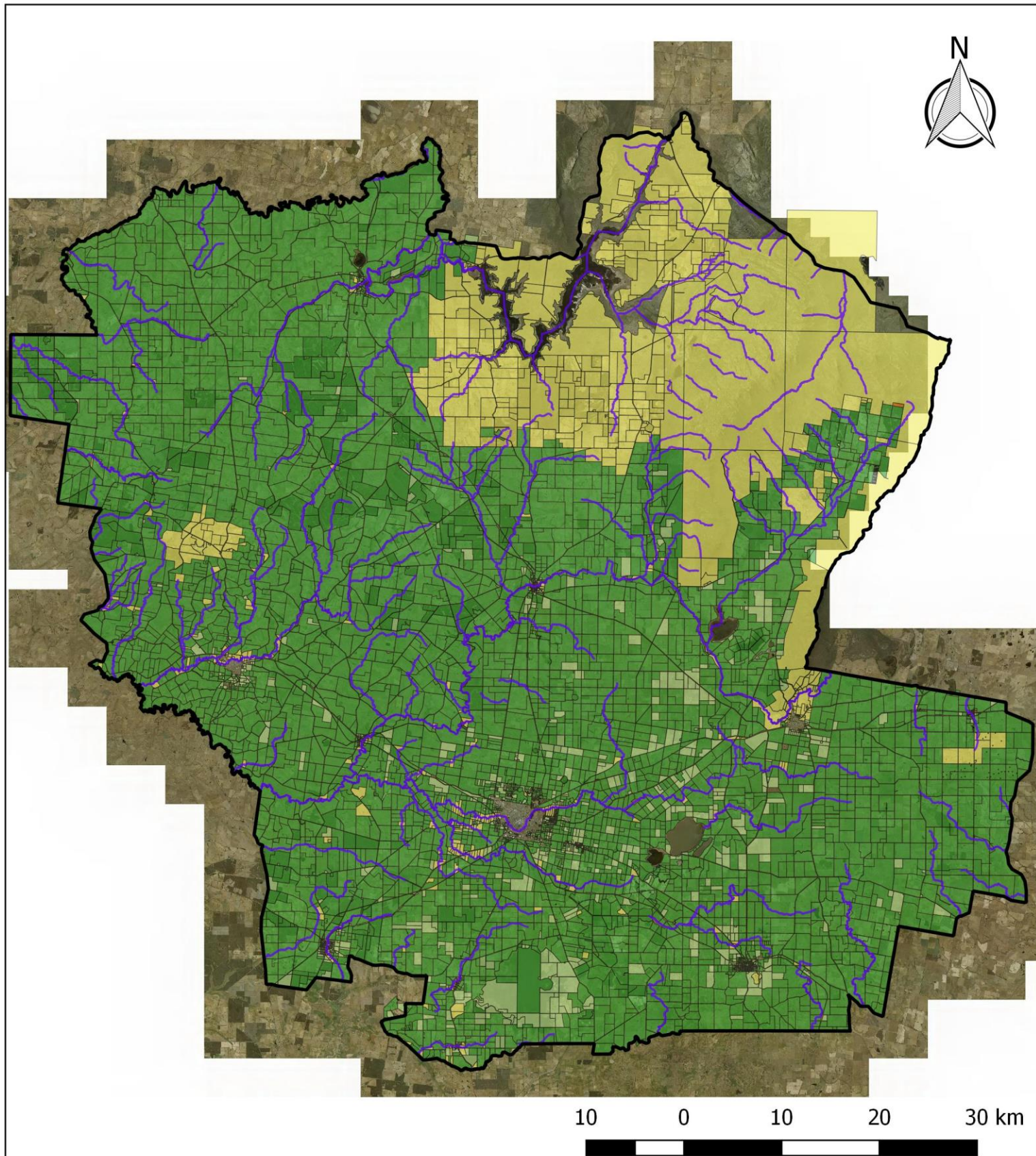
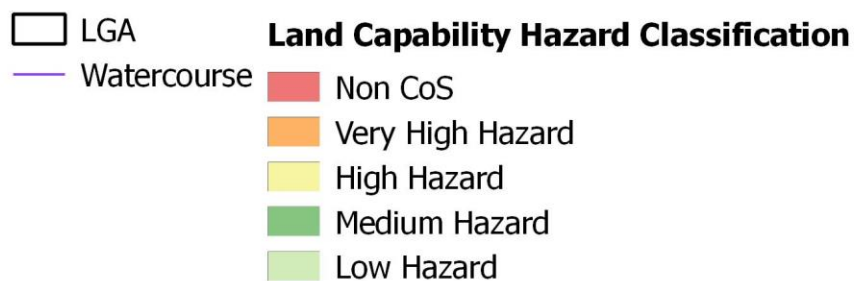


Figure 5-1: Southern Grampians Land Capability Hazard Classification Map



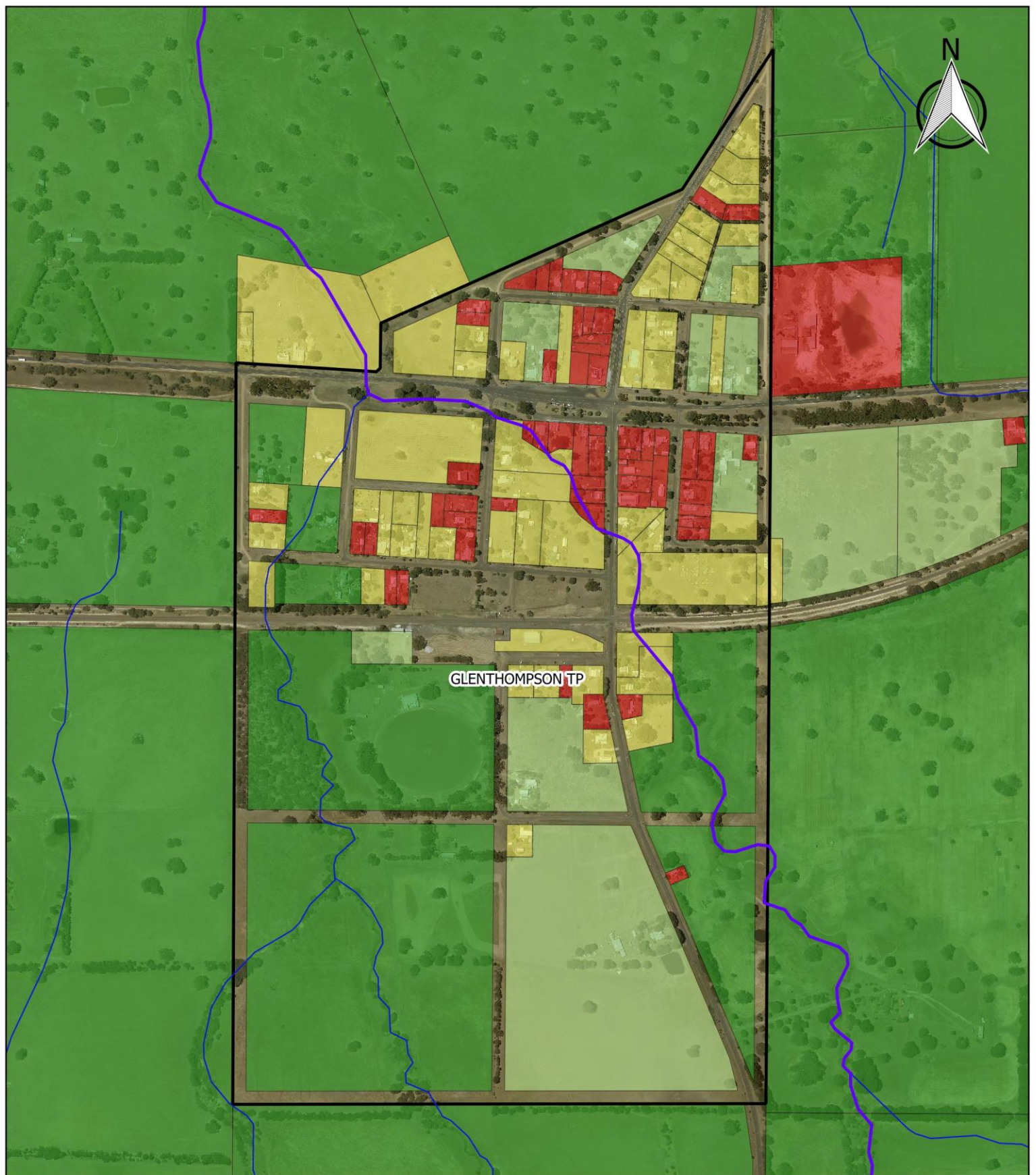
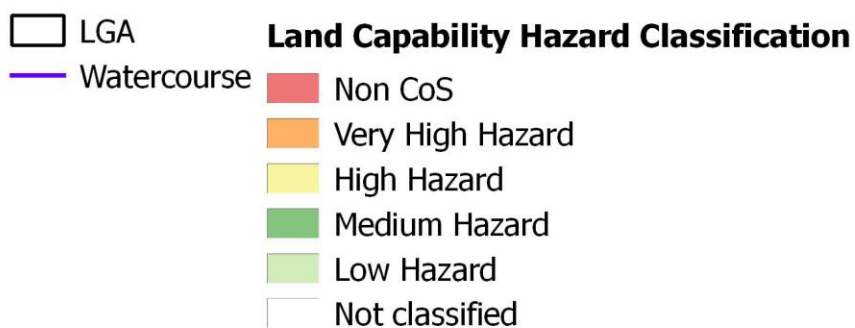


Figure 5-2: Land Capability Hazard Classification Focus Area: Glenthompson



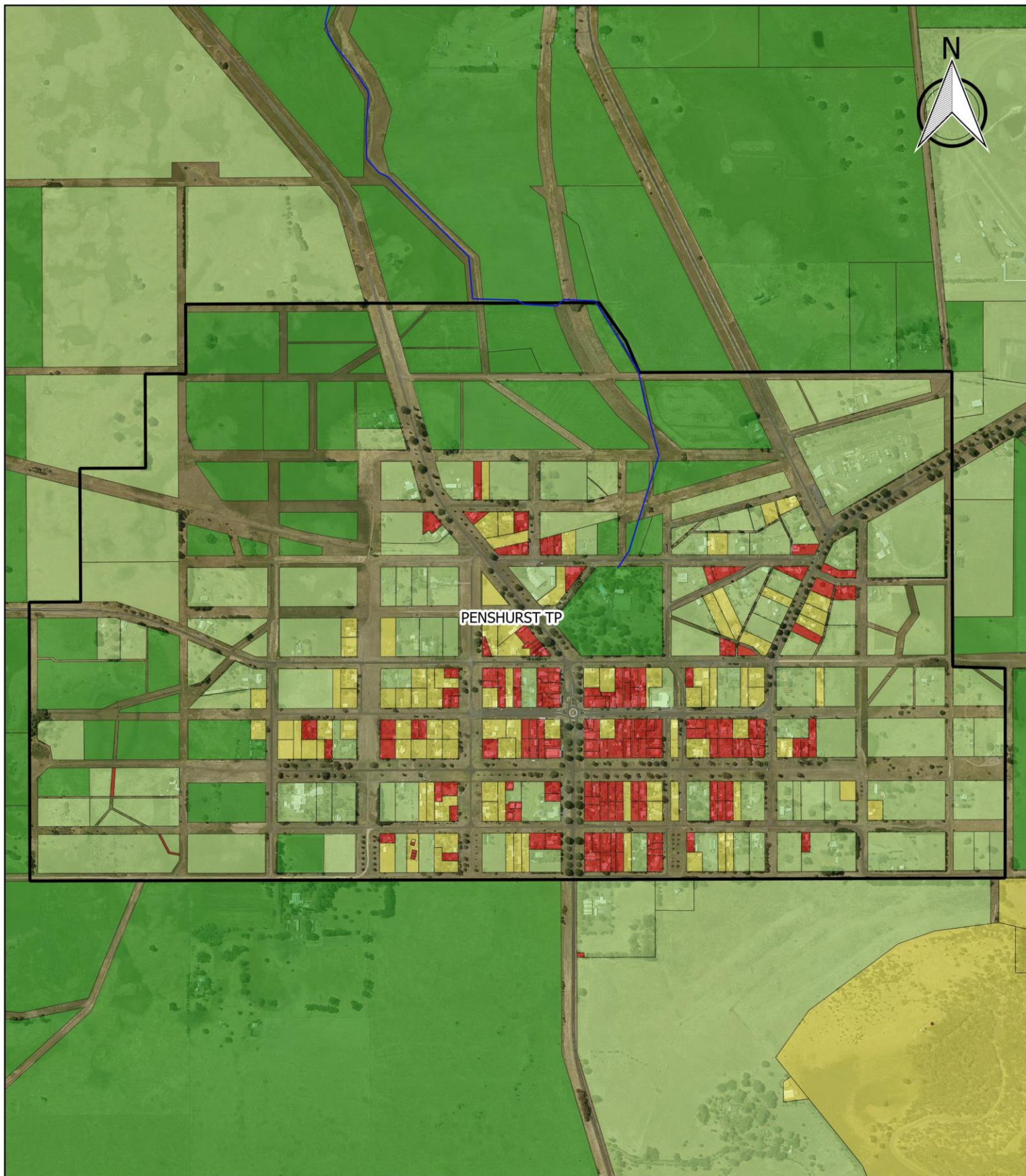


Figure 5-3: Land Capability Hazard Classification Focus Area: Penshurst

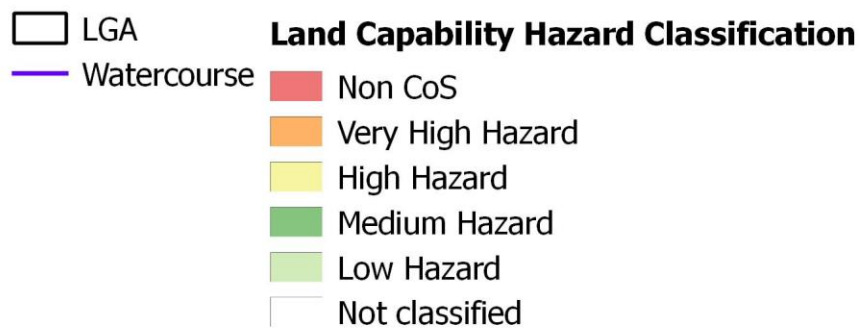




Figure 5-4: Land Capability Hazard Classification Focus Area: Branhholme

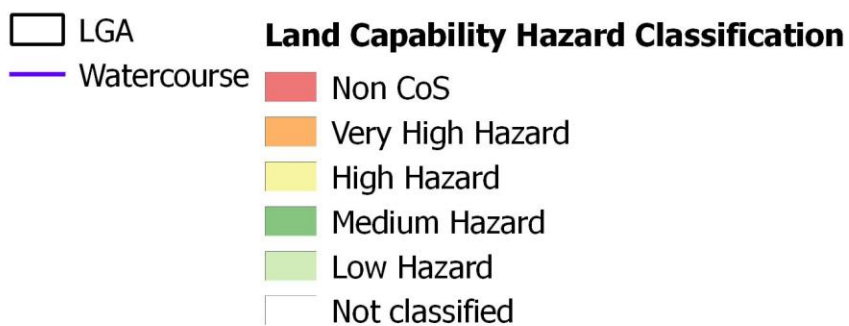




Figure 5-5: Land Capability Hazard Classification Focus Area: Tarrington

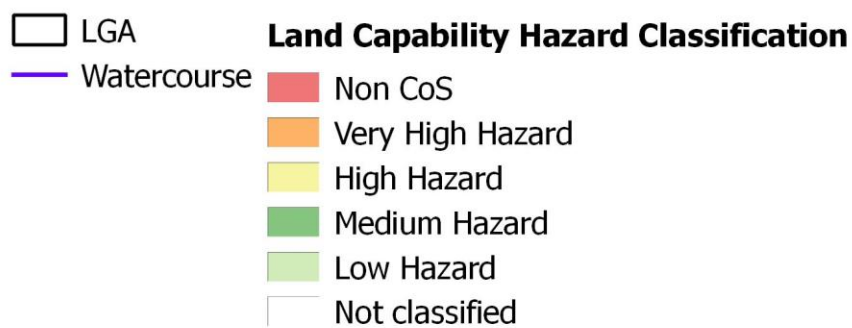
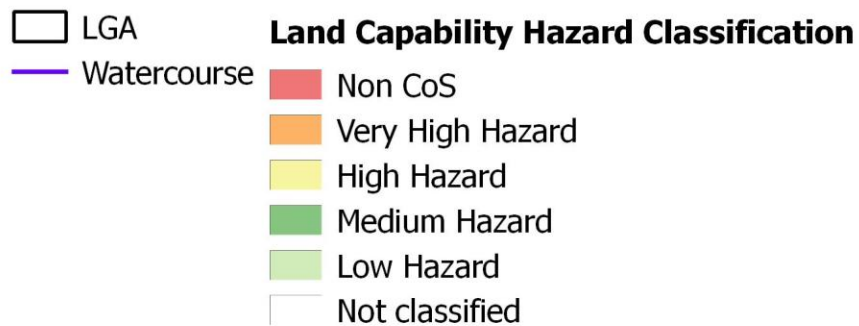




Figure 5-6: Land Capability Hazard Classification Focus Area: Balmoral



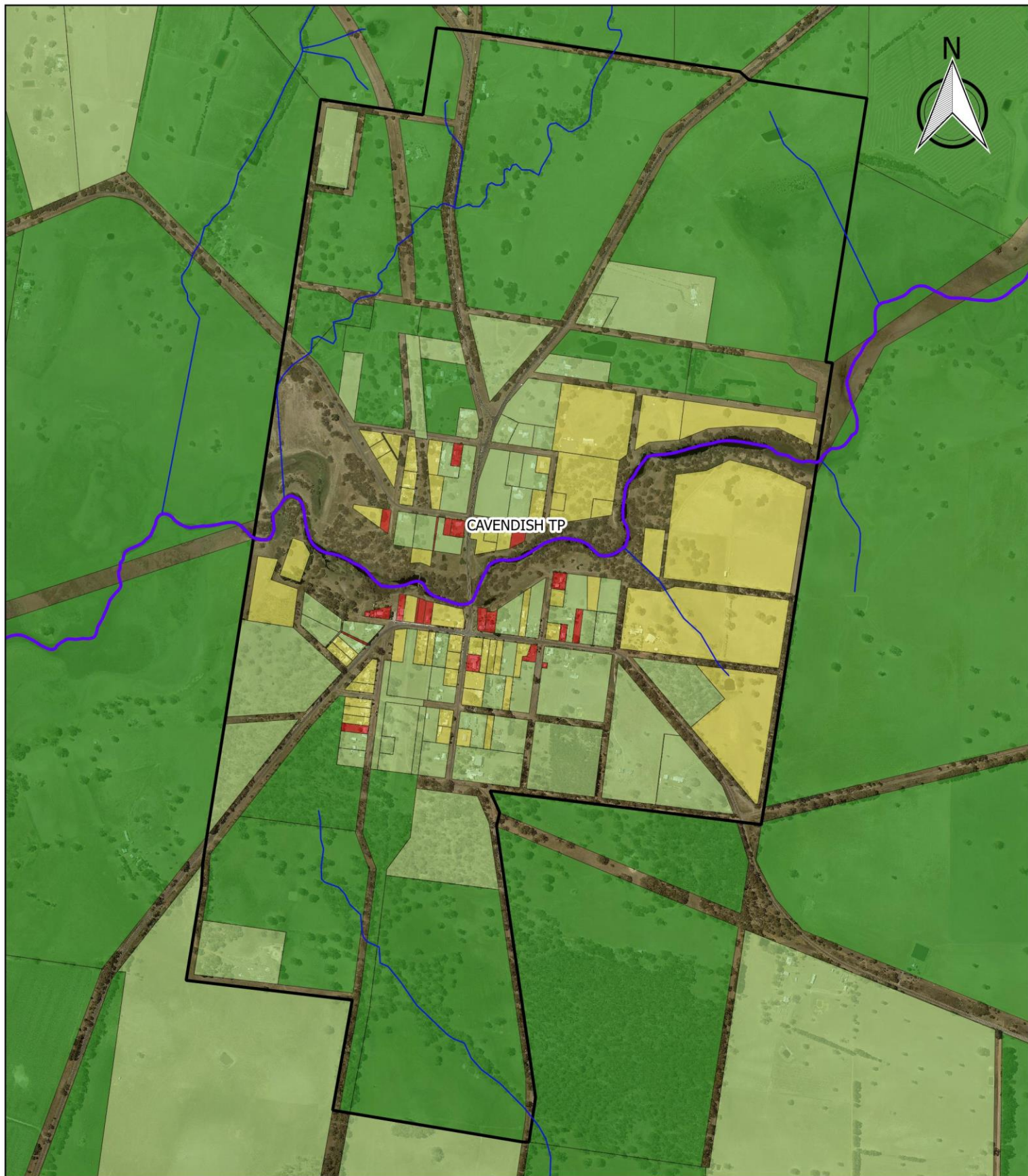


Figure 5-7: Land Capability Hazard Classification Focus Area: Cavendish



5.3 On-site Wastewater System (Management) Hazards

DWC have undertaken analysis of available data on the type, age and condition of the various types of on-site wastewater management systems in the Southern Grampians Shire. Audit Program field inspection data has currently been obtained for a number of key townships and has been documented in Council's Audit Program Project Reports. These townships include;

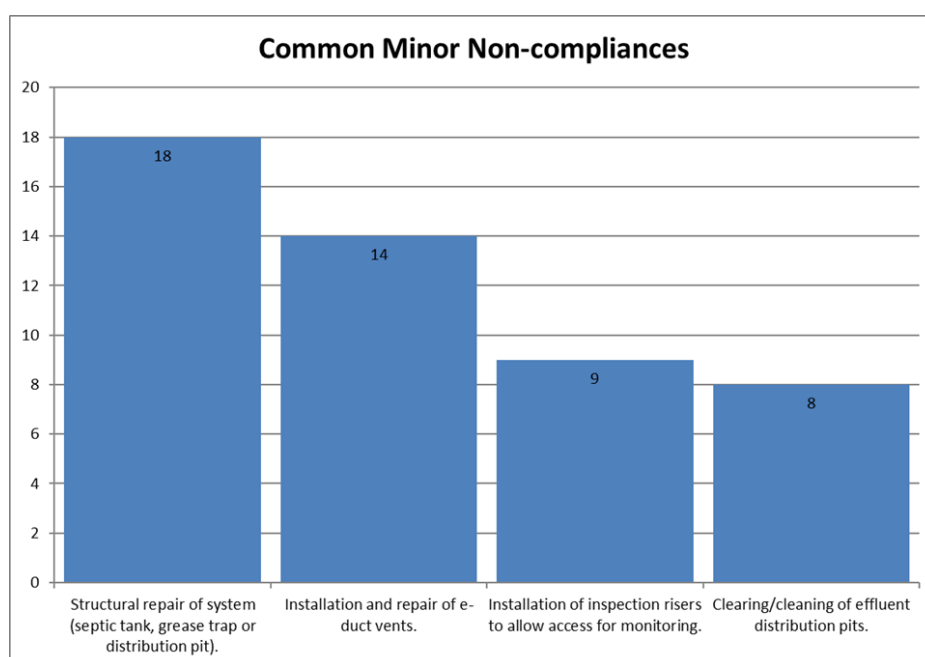
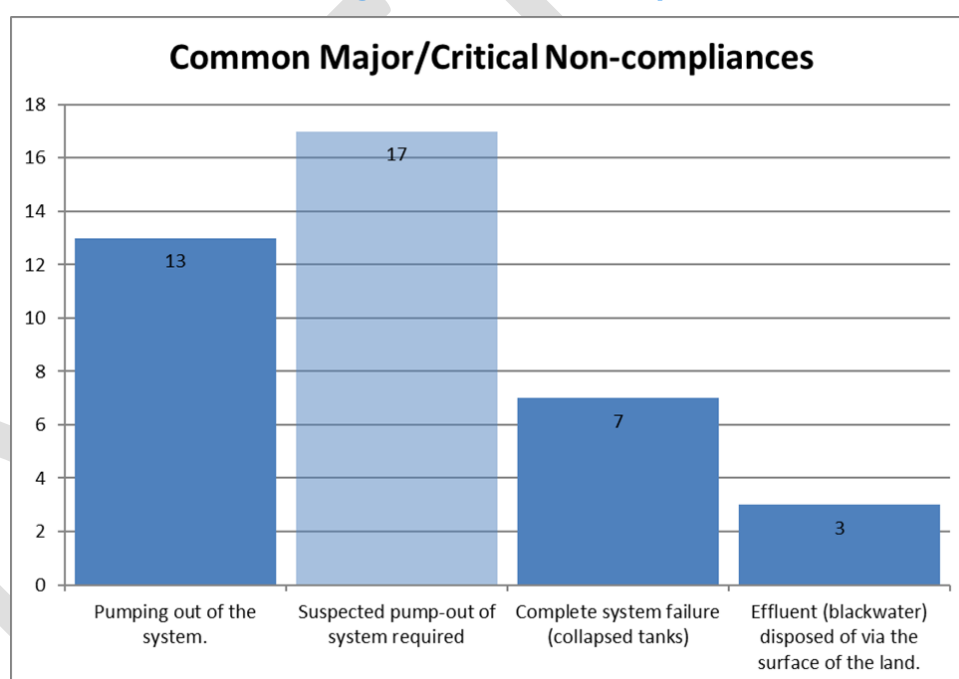
- Penshurst
- Glenthompson
- Branxholme
- Balmoral
- Cavendish
- Hamilton – 14 unsewered lots along Hiller Lane and Glenelg Highway / Ballarat Road.

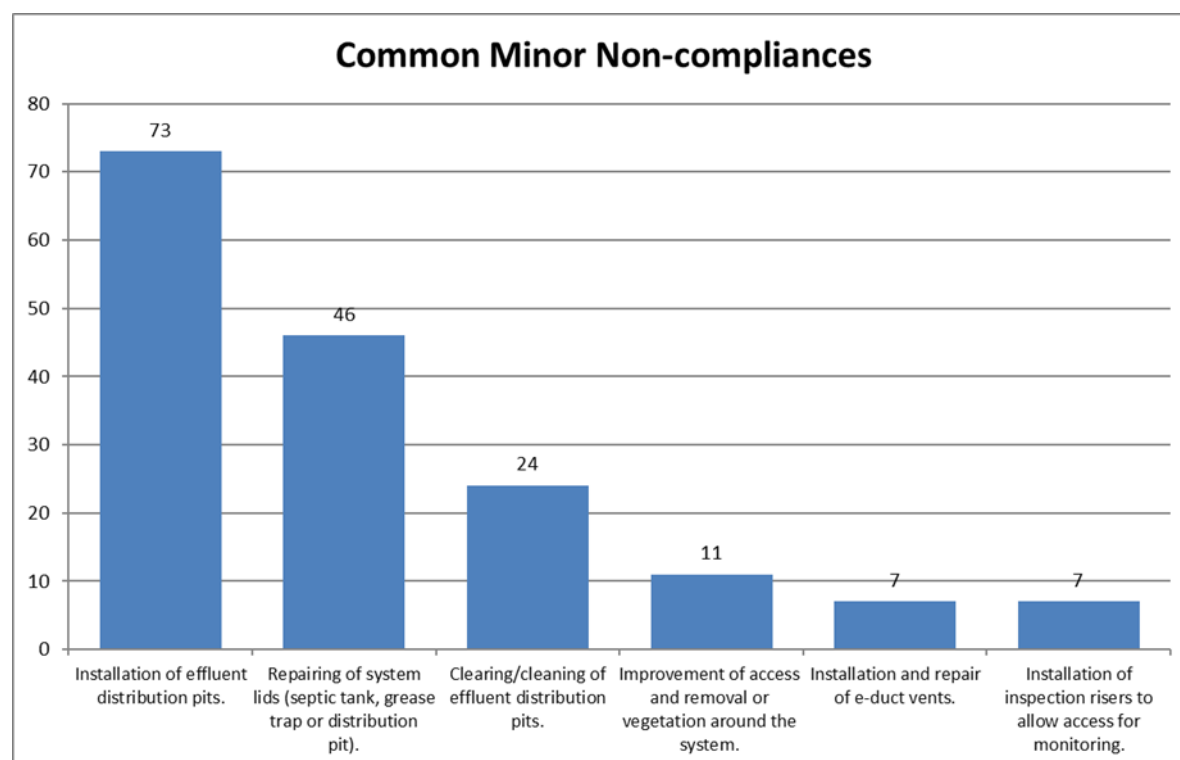
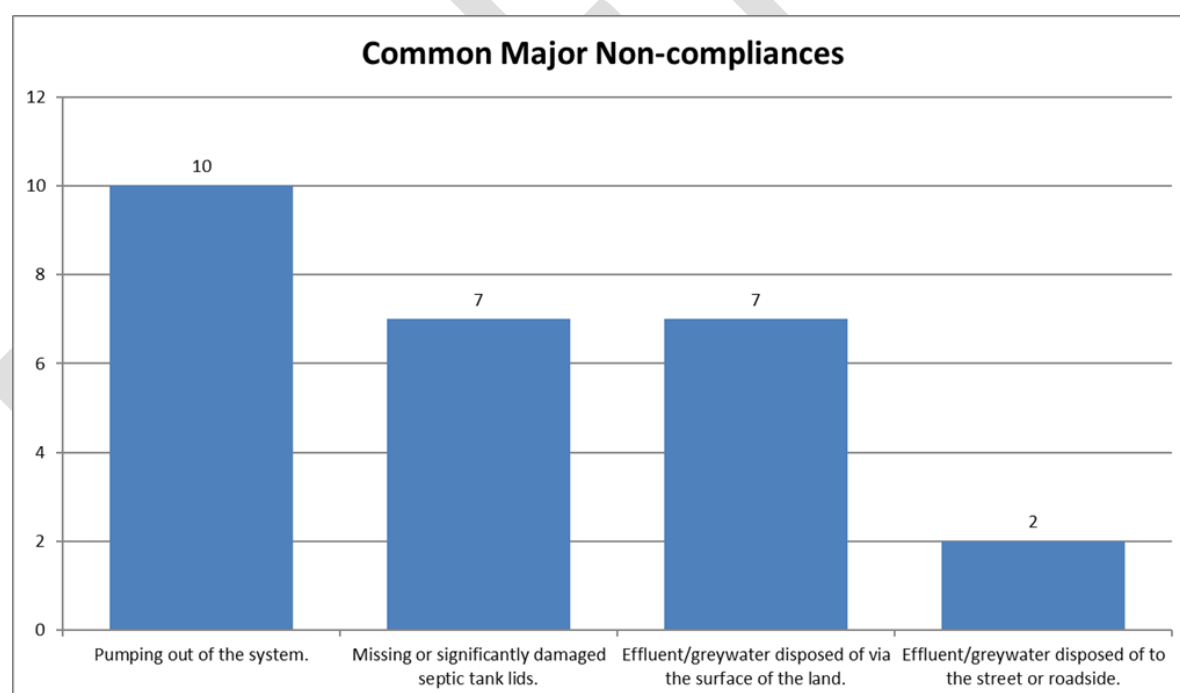
These data chiefly consisted of compliance information for each system in accordance with the EPA Code of Practice, and in particular systems with major or critical non-compliance issues such as blocked or damaged wastewater disposal areas. The number of major / critical non-compliance systems was considered as part of the risk based prioritisation process undertaken to identify and rank high risk townships in the Shire.

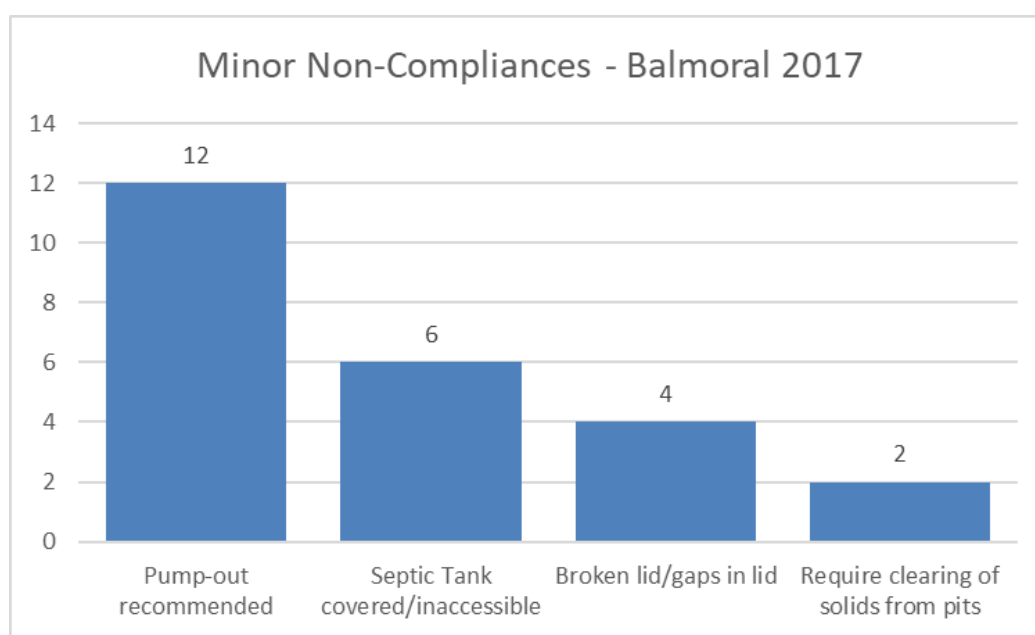
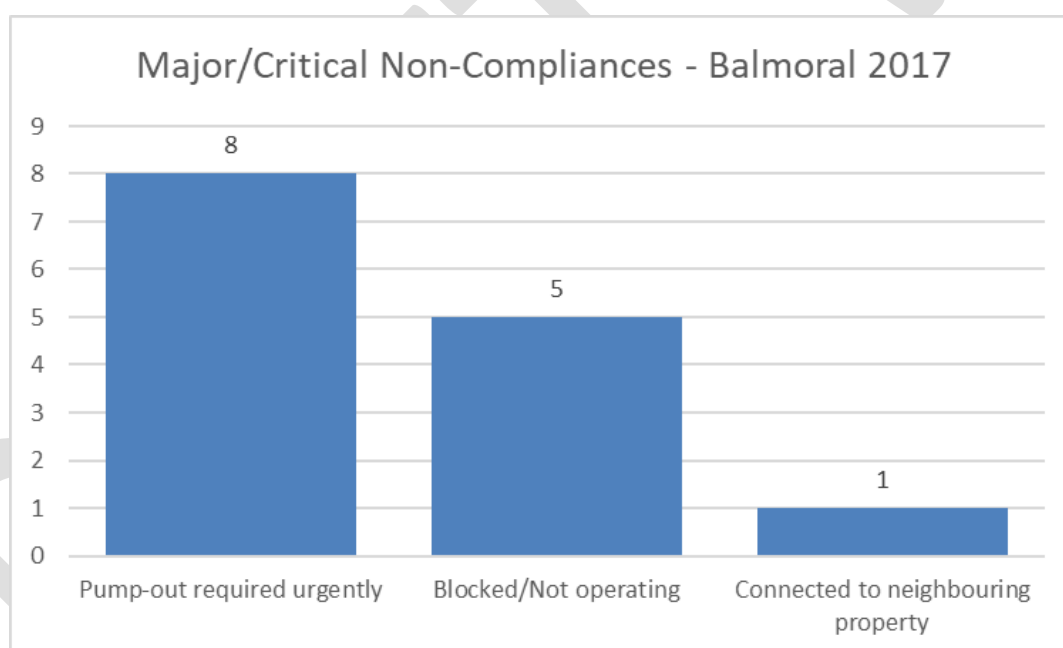
Of primary interest from the inspection data is the location and number of systems that incorporate some form of off-site discharge. This typically occurs with older 'split' systems where greywater is directed to stormwater drains or older sand filter systems where treated sewage was permitted under EPA guidelines to discharge off-site on properties considered unsuitable for full on-site containment predominantly in the 1980's. Off-site discharge systems should form the focus of Council actions and efforts to understand and manage wastewater risks.

5.3.1 Results of Council Audit Program Inspections

The results of the Council Audit Program for onsite system inspections are presented below. Figures have been taken as per the reports prepared for community consultation and system type data has been presented where available.

Glenthompson**Figure 7 Minor Non-compliances****Figure 8 Major / Critical Non-compliances**

Penshurst**Figure 9 Minor Non-compliances****Figure 10 Major / Critical Non-compliances**

Balmoral**Figure 11 Minor Non-compliances****Figure 12 Major / Critical Non-compliances**

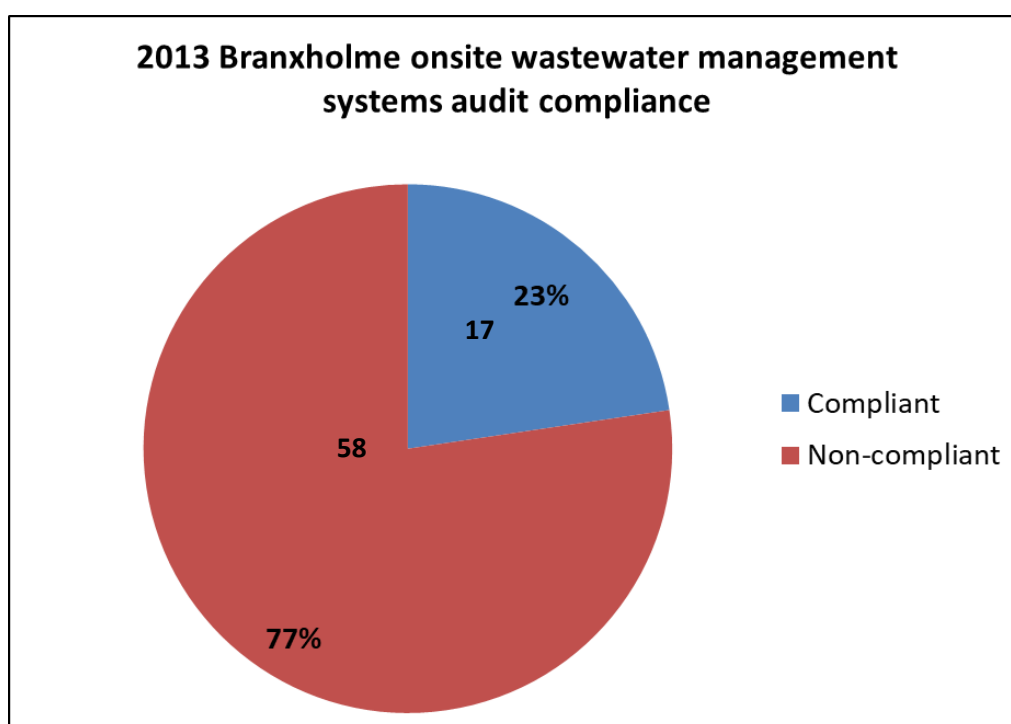
Branxholme

Figure 13 General Compliance and Non-compliances

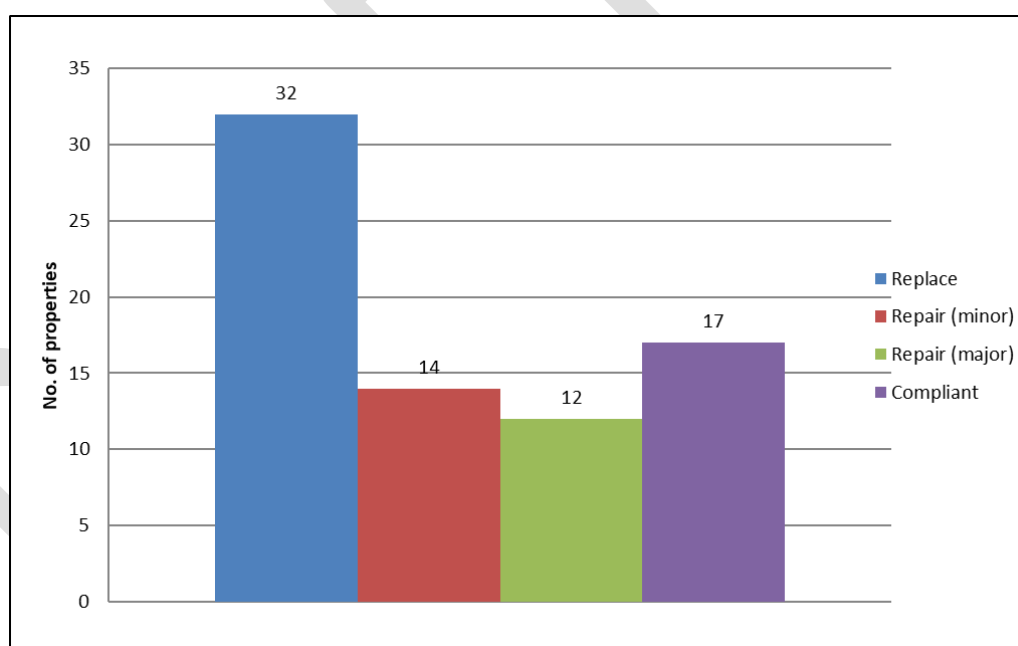
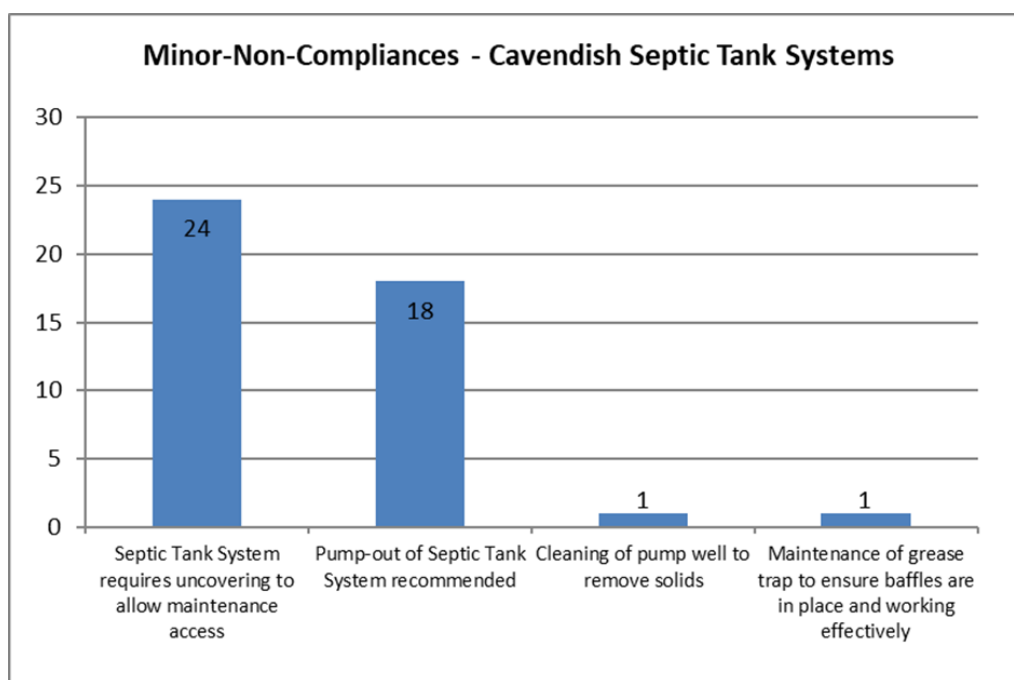
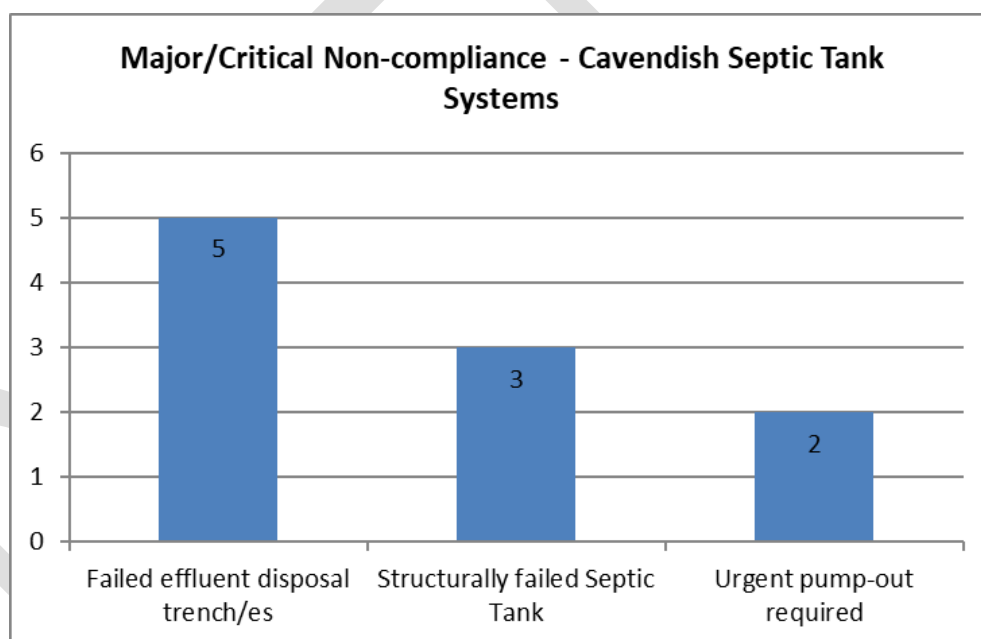


Figure 14 Statistics for On-site Systems Requiring Replacement or Repairs

Cavendish**Figure 15 Minor Non-compliances****Figure 16 Major / Critical Non-compliances**

5.3.2 On-site System Permit Register Data

In addition to the area specific on-site system inspection data collected as part of the Audit Program (presented above), historical Septic Tank permit and inspection datasets provided by Council were analysed. These datasets provide the best current idea of broad system type information across the Shire.

Given Council are currently in the process of importing permit and inspection data into their health and property data management systems, the analysis being undertaken as part of the DWMP process is preliminary only. The DWMP includes a recommend actions relating to both on-going data collection and analysis.

Septic Tank Permit records for approximately 1,100 on-site systems have been entered into the Council database (with duplicate properties removed by DWC as best as possible). **This is likely to be approximately 20% of total systems.** In addition, the historical system data based on previous inspections consisted of approximately 650 records (duplicates properties were removed as best as possible). Table 8 and Table 9 summarise the breakdown of on-site system types in Southern Grampians Shire based on permit and historical inspection data respectively. Table 10 summarise permit on-site system types for some of the key unsewered townships and localities. These breakdowns may change as the coverage and accuracy of data improves.

Table 8 Summary of Existing On-site Wastewater Management Systems in Southern Grampians (20% data coverage)

System Types	Number	Percentage
Primary Treatment (Septic Tank) – Unknown Land Application Method	754	68.7%
Primary Treatment - Trenches/Beds	5	0.5%
Sand Filter - Unknown	1	0.1%
Treatment Plant - Unknown	213	19.4%
Composting System / Worm Farm	10	0.9%
Split System	13	1.2%
Other	5	0.5%
Unknown	97	8.8%
Total	1,098	

Table 9 Summary of Historical Inspection Data for On-site Wastewater Management Systems

System Types	Number	Percentage
Primary Treatment (Septic Tank) - Unknown Land Application Method	77	12%
Primary Treatment - Trenches/Beds	342	52%
Primary Treatment - Mound	2	0.3%
Secondary Treatment (Treatment Plant or Sand Filter) - Unknown	51	8%
Secondary Treatment - Irrigation	134	21%
Secondary Treatment - Trench/bed	12	2%
Composting System / Worm Farm	8	1%
Split System	11	2%
Other	2	0.3%
Unknown	13	2%
Total	652	

Table 10 On-site Wastewater Management System Permit Information for Localities

Suburb / Locality	Primary Treatment - Unknown	Primary Treatment - Trenches/Beds	Sand Filter - Unknown	Secondary Treatment - Unknown	Composting System / Worm Farm	Split Systems	Other	Unknown	Total
Balmoral	125	3	0	6	0	1	1	1	137
Bear	1	0	0	0	0	0	0	0	1
Bochara	10	0	0	2	0	0	0	0	12
Branxholme	35	0	0	9	1	1	0	42	88
Brit Brit	1	0	0	1	0	0	0	0	2
Bulart	3	0	0	2	0	0	0	1	6
Byaduk	2	0	0	1	0	0	0	0	3
Byaduk North	1	0	0	1	0	0	0	0	2
Carapook	1	0	0	0	0	0	0	0	1
Cavendish	21	0	0	16	0	0	1	39	77
Coleraine	11	0	0	4	0	1	0	0	16
Coojar	2	0	0	0	0	0	0	0	2
Croxton East	4	0	0	0	0	0	0	0	4
Culla	2	0	0	0	0	0	0	0	2
Dunkeld	33	0	0	10	3	0	1	2	49
Englefield	1	0	0	0	0	0	0	0	1
Gatum	1	0	0	1	0	0	0	0	2
Gazette	3	0	0	0	0	0	0	0	3
Glenisla	4	0	0	0	0	0	0	0	4
Glenthompson	100	0	0	2	0	5	0	0	107
Gringegalgona	3	0	0	0	0	0	0	0	3
Gritjurk	4	0	0	0	0	0	0	0	4
Hamilton	176	1	0	105	3	0	1	5	291
Harrow	0	0	0	0	0	1	0	0	1
Hensley Park	7	0	1	1	0	0	0	0	9
Hilgay	3	0	0	0	0	0	0	0	3
Karabeal	2	0	0	0	0	0	0	0	2
Kay/Yalimba East	1	0	0	0	0	0	0	0	1
Konongwootong	5	0	0	0	0	0	0	0	5

Suburb / Locality	Primary Treatment - Unknown	Primary Treatment - Trenches/ Beds	Sand Filter - Unknown	Secondary Treatment - Unknown	Composting System / Worm Farm	Split Systems	Other	Unknown	Total
Melville Forest	4	0	0	0	0	0	0	0	4
Mirranatwa	6	0	0	0	0	0	0	0	6
Mooralla	8	0	0	1	1	0	0	0	10
Mooree	1	0	0	0	0	0	0	0	1
Morgiana	0	0	0	1	0	0	0	0	1
Moutajup	9	0	0	0	0	0	0	0	9
Murndal	1	0	0	0	0	0	0	0	1
Nareeb	3	0	0	0	0	0	0	0	3
Nareen	6	0	0	0	0	1	0	0	7
North Hamilton	3	0	0	0	0	0	0	0	3
Penshurst	74	0	0	21	0	0	0	1	96
Pigeon Ponds	1	0	0	0	0	0	0	0	1
Redruth	1	0	0	0	0	0	0	0	1
Rocklands	3	0	0	0	0	0	0	0	3
South Hamilton	3	0	0	0	0	0	0	1	4
Strathkellar	4	0	0	3	0	0	0	1	8
Tabor	1	0	0	0	0	1	0	0	2
Tahara	3	0	0	0	0	0	0	0	3
Tarrayoukyan	2	0	0	1	0	0	0	0	3
Tarrenlea	1	0	0	0	0	0	0	0	1
Tarrington	25	0	0	14	1	2	0	3	45
Vasey	3	0	0	0	0	0	0	0	3
Victoria Point	1	0	0	0	0	0	0	0	1
Victoria Valley	5	0	0	1	1	0	0	0	7
Wannon	6	0	0	4	0	0	1	0	11
Warrayure	3	0	0	0	0	0	0	0	3
Woodhouse	3	0	0	0	0	0	0	0	3
Wookurkook	0	0	0	1	0	0	0	0	1
Wootong Vale	1	0	0	0	0	0	0	0	1
Yulecart	11	1	0	5	0	0	0	1	18
TOTAL	754	5	1	213	10	13	5	97	1,098

It can be seen that the majority of systems are traditional septic tank with an unknown method of disposal / land application. Based on advice from Council, it is understood that a large number of systems are older (i.e. more than 30 years) "split" systems where greywater is typically piped off site via stormwater and only the blackwater is treated by septic tank and applied to land. It is expected that these systems without a known method of wastewater disposal may include a number of split systems with some level of direct off-site discharge. Others may consist of traditional absorption trench and bed systems.

The Permits currently classified as "Unknown" in the tables above consists of entries in the database that were in the process of being migrated (classed as "Migration System Type"). More recently new Approval to Installs have included a higher proportion of secondary treatment systems and sand filters.

Existing on-site systems that likely pose a significant risk to human health and the environment are in higher proportions in Glenthompson, Penshurst, Balmoral and Branhholme. Older "split" systems in these areas (especially when located in an area with small property sizes) have been shown to pose a significant risk to human health and water quality (BMT WBM, 2016). Implementation of alternative wastewater management solutions should be a priority for these sites.

While more traditional septic tank to absorption trench / bed systems can be a reliable and effective on-site wastewater management option, small property sizes in a number of unsewered areas in Southern Grampians Shire do not favour this approach. Limited available area, in addition to constraints such as low permeability soils, climate and presence of intermittent watercourses combine to make both the constructability and operational reliability of septic tank to trench / bed system limited. Comprehensive Land Capability Assessment (LCA) and on-going oversight are therefore critical to their effective performance.

The number and proportion of secondary treatment systems (including sand filters) will continue to grow in Southern Grampians Shire as existing on-site systems are replaced and new unsewered development occurs. While these technologies are necessary on a variety of sites to meet EPA Code of Practice requirements and overcome land capability constraints, they do inevitably require higher levels of maintenance to ensure effective operation. Scheduled maintenance and three yearly inspections are a condition of approval for secondary treatment systems.

It is recommended that on-site wastewater management system (on-site system) data continue to be refined and developed to enable Council to maintain an active register of higher risk existing on-site systems. Ideally, this should be linked with a spatial (GIS) mapping layer that enables Council to clearly identify hotspot areas that may warrant higher levels of operational oversight. As inspection data for existing systems grow, it can also be incorporated into this database.

This work will also enable operational risk to be overlayed with land capability risk to highlight the areas where the two types of hazard have the potential to create very high risk conditions. The most significant of these areas based on this DWMP Risk Assessment is Glenthompson and Penshurst with an alternative wastewater management solution likely for meeting regulatory requirements.

5.4 Unsewered Development and Septic Tank Permit Approvals

DWC have been consulting with Council's Strategic Planning staff to ensure the DWMP adequately aligns with current Planning Scheme and relevant Structure Plans.

The DWMP work discussed in Sections 5.2 and 5.3 will inform the development of recommended minimum standards for both subdivision and future Septic Tank Permit applications in relation to;

- Land Capability Assessment (LCA) standards;
- Cumulative impacts in constrained and/or sensitive areas; and
- Potential for deemed to comply rules that could be applied to Low Risk properties.

The DWMP contains draft Minimum Standards in Appendix B for LCAs and Septic Tank Permit applications that are risk based and applicable to the on-site wastewater risk classification assigned to each unsewered property in Southern Grampians Shire. This will provide Council with a consistent framework and clear expectations for applicants to follow when preparing Permit applications for both unsewered subdivision or individual systems.

5.4.1 Lot Size

Statistics were developed for property size across Southern Grampians Shire and these are summarised below in Table 11. As can be seen the typical lot size across Southern Grampians Shire is large to very large, which is consistent with the low to moderate land capability hazard class identified for a reasonable proportion of properties. DWC consolidated comprehensive minimum lot data (for sustainable on-site system installation) from previous projects undertaken for areas similar to Southern Grampians Shire (large rural properties). Details of the data are provided in Appendix C.

The extensive data collated / analysed consistently indicates that lot sizes greater than 4,000 m² are likely to be capable of fitting a sustainable on-site sewage management system within the property assuming aspects such as native vegetation protection can be managed through site specific design and communication between relevant Council staff. This equates to the 15% percentile lot size across Southern Grampians Shire and aligns with the low to moderate land capability hazard observed overall as there is typically sufficient useable land to manage these constrained and setbacks (if present).

Table 11 Southern Grampians Shire Unsewered Property Size Statistics

Statistics	Approximate Property Size
10 th Percentile	1,970 m ²
Median	19.6 hectares
Mean	99.7 hectares
95 th Percentile	385 hectares

5.5 Water Quality Sampling Data

Existing water quality monitoring data was available for a number of key locations and consisted of the following. The data indicated potential pollution risks from on-site systems but was inconclusive. A more detailed monitoring strategy would be required to provide greater clarity regarding potential risks from these sources.

5.5.1 Branxholme

A small number of water quality grab samples (1-2 depending on the site) were analysed as part of the Branxholme Sewage and Wastewater Feasibility Study (2013). The sampling locations (five in total) consisted of Arrandoovong Creek and a number of stormwater outlet sites in within Branxholme township (refer to Figure 5-3 in the study report for specific locations). The analysis was commissioned by SGSC due to community concern regarding environmental pollution from on-site wastewater systems in the township.

The data indicated that E. Coli bacteria levels were elevated for two grab samples along the Creek. Additional analysis was undertaken during the next set of grab samples to confirm if this was from human sources (e.g. wastewater). The data suggested that contamination may have come from human sources, however E. Coli bacteria based on animal indicators (sources) were identified as high probability. **The findings were inconclusive given the lack of data and a formal monitoring strategy was identified as a requirement if further analysis was to be undertaken to confirm risk from on-site systems.**

5.5.2 Penshurst

Groundwater sampling data was available for four pond locations within Penshurst and consists of four grab samples each from 2011 to 2016. The data indicated elevated E. Coli bacteria results for three of the pond locations in 2016 (210 to 390 orgs/100mL). **Penshurst is another key high risk township in which any monitoring program could potentially be focused on.**

5.5.3 Lake Hamilton / Grangeburn

Over ten years of water quality data for Lake Hamilton and Grange Burn (waterway which flows to and from Lake Hamilton) is available for a number of parameters. Given the extensive data available over a long time period it is difficult to easily and concisely summarise it in this plan.

However, the figure below shows a summary of the E. Coli sampling (median values), which indicates a eight instances in which the threshold has been exceeded.

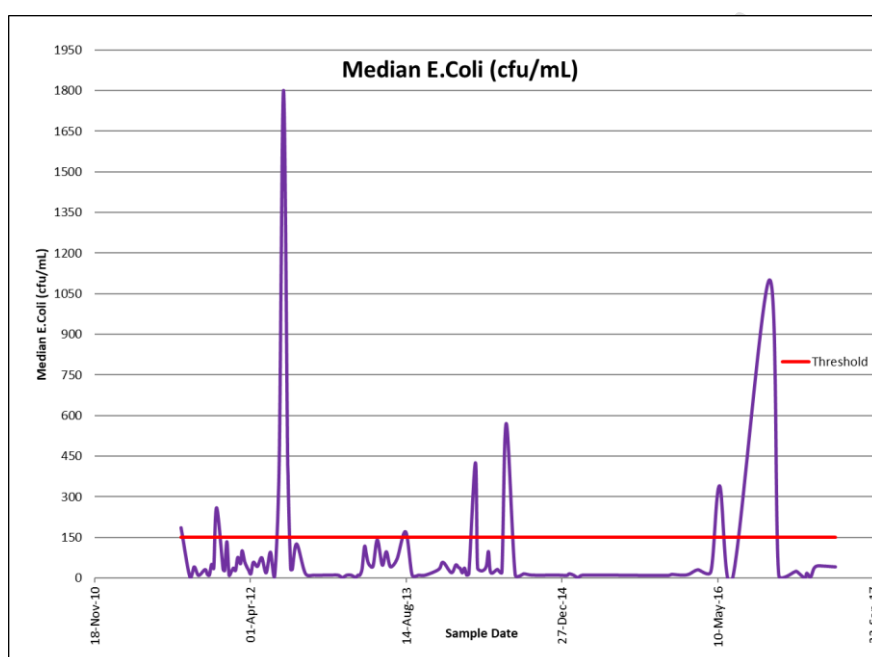


Figure 17 Lake Hamilton and Grangeburn E. Coli Sampling

Significant sampling data is also available for cyanobacteria (blue-green algae) which also indicates that algal blooms have periodically been forming in Lake Hamilton.

5.6 Risk Based Prioritisation Process

A risk based prioritisation process has been undertaken by DWC to identify and rank higher risk villages / townships within Southern Grampians Shire. This process was utilised to rank villages / townships into "bands" of priority for further actions. These actions could include further system inspection / rectification or development of alternative wastewater management solutions.

Data confirming the type, age and condition of on-site systems in Southern Grampians Shire has been utilised where available, as Council have collected extensive data for a number of areas with historical issues from on-site wastewater systems. The prioritisation process consists of a multi-criteria analysis (MCA) including the following elements;

- land capability using the proportion of properties classified as not able to Contain on Site (Non-CoS) in addition to the average land capability hazard class across the specific area;

- available on-site system type, age and condition data from field inspections. This consisted of numbers of both major / critical non-compliant systems and known off-site discharge and split systems (greywater discharge off-site);
- receiving water sensitivity, which included proximity of properties to named or intermittent waterways.

A simple scoring system was utilised for each sub-measure, ranging from Lower Risk (1) to High Risk (5). The score of each sub-measure was then combined to provide a final risk score. The higher the final risk score the higher the ranking and priority for consideration as part of the DWMP. All sub-measures were weighted equally i.e. no sub-measure was considered more important than the others. Details of the scoring measures are summarised in the table below.

Table 12 Prioritisation Process Summary

Category	Sub-measure	Details
Sustainability of On-site Wastewater Management	Properties that are too small to contain all wastewater on-site (Non CoS).	Both the number and % of Non CoS systems were determined for the respective area, based on the land capability and lot size analysis undertaken (refer Section 5.2).
	Land capability hazard for on-site containment.	Average land capability hazard for the area in addition to the average Final CoS Hazard (includes lot size constraints) was calculated for respective area.
Existing and Legacy System Performance Issues	Major and critical non-compliance system issues.	Both the number and % of major and critical non-compliant systems were determined from Council's Audit Program inspection data.
	Split system and known off-site discharge (OSD) systems.	Both the number and % of split system and known OSD systems were determined from Council's Audit Program inspection data. Historical septic tank inspection / register data set was also utilised.
Receiving Environment Sensitivity	Proximity to sensitive waterways.	A desktop assessment of the proximity of high risk properties to sensitive waterways (permanent and intermittent) was undertaken and scored accordingly.

The results of this analysis are presented in Section 5.7.4. Further details of the Prioritisation scoring and process is provided in Appendix E. The MCA scoring process has been developed as they the ranking can be easily updated as more recent and accurate on-site system data is collected for specific areas.

5.7 Key Outcomes of Risk Assessment

5.7.1 Land Capability Hazards

- Land Capability in Southern Grampians Shire is generally moderately constrained with respect to safe and sustainable on-site wastewater management. However property size, climate, low permeability soils and incised watercourses do pose a greater constraint in specific locations.
- Constraints can typically be managed through;
 - adequate minimum lot size (2ha is a recommended benchmark with 0.4 and 1ha by exception and with consideration of cumulative impacts);
 - increased Land Capability Assessment (LCA) and design detail on constrained properties to support Septic Tank and Planning Permit applications;
 - provision of secondary treatment to enable a wider array of land application options on more constrained lots with respect to soil, slope and watercourses; and
 - adequate maintenance and performance auditing (currently constrained by resources and regulatory powers).

5.7.2 Existing On-site Wastewater Management System Risks

Council's estimates (as per previous community consultation) indicate there are a total of approximately 5,000 existing On-site Wastewater Management Systems across the Shire. An initial compilation and cleaning of historical Septic Tank Permit (~1,100 properties) and inspection data (~650 properties) has been undertaken that identifies some gaps in understanding of the nature and condition of systems in Southern Grampians Shire. In particular the amount of known systems with some form of off-site discharge.

Council are continuing to improve the accuracy and completeness of these datasets through area specific inspection data collected as part of the on-site system Audit Program in addition to entry of Permit or inspection data as it is available. This has provided good information for a number of high risk townships through extensive field data collection. This confirmed the presence of some older "split" systems that discharge wastewater off-site. Typically the major or critical compliance failures appear to be due to damaged treatment (septic) tanks and land application / disposal areas. However, this will ultimately result in a similar potential risks as an off-site discharge system given only limited treatment will be occurring prior to any off-site effluent movement.

It is recommended that Council continue to undertake investigations to confirm the number and location of major / critical non-compliant system across the Shire, beginning with Tarrington and broader unsewered lots surrounding Hamilton and Dunkeld. The existing permit data indicates there is a reasonable amount of existing systems with unknown disposal method information.

The majority of existing systems in Southern Grampians Shire are more traditional septic tank (primary treatment) systems that drain to an absorption or Evapo-transpiration / absorption (ETA) trench or bed. This approach remains a reliable option for larger properties (indicatively greater than 1ha) due to the lack of moving parts and reduced reliance on maintenance. However, many of the soils and climate in Southern Grampians Shire pose challenges to the design and construction of trench / bed systems in accordance with the EPA Code of Practice and *AS1547:2012*. It is recommended that Council consider the development of a clear and consistent set of minimum standards for the design and construction of primary treatment to trench / bed systems to ensure that good quality outcomes are achieved for Council and the property owner. This should include clear guidance on when septic tank to trench / bed systems will be considered and when they are not considered an acceptable long-term solution.

Notwithstanding, the primary risk factor associated with existing on-site systems is consistently the level of management and oversight applied to them on an on-going basis. Almost any on-site system will fail to meet community standards in the absence of an on-going operation, maintenance and monitoring program. Under current legislation, responsibility for operation and maintenance rests with the property owner whilst regulatory oversight rests with Council (for systems <5,000 L/day).

Under the recent revision of the SEPP (WoV), a DWMP is to “provide for the compliance assessment and enforcement of on-site domestic wastewater systems in accordance with the plan.” It is recommended that Council investigate opportunities and funding mechanisms and potential legal options for establishment of a more comprehensive operational oversight program for on-site systems.

5.7.3 New Unsewered Developments

There have recently been approximately 30-40 new unsewered allotments created per annum in Southern Grampians Shire which is a relatively modest number compared to other jurisdictions. However, many of these applications relate to township zoned properties that are below the recommended 4,000 m² property size and require Land Capability Assessment and careful design and installation.

Council staff have raised concern about challenges associated with small undeveloped parcels of land in township zones. Some of these undeveloped lots have been classified as unable to contain on site or highly constrained for sustainable on-site wastewater management. Specific Minimum Standards are recommended for these properties that seek to minimise risk to human health and the environment.

The evaluation of sustainable lot sizes for on-site wastewater management conducted as part of this DWMP support the current minimum lot size in Rural Living zone of 2 ha. **While sustainable on-site wastewater management is achievable on lots that are 0.4 - 1ha in size, past experience in Southern Grampians Shire and other jurisdictions has shown that site**

specific constraints and a greater reliance on diligent owner management can increase the risk of human health and environmental impact.

As such, planning permit applications for new unsewered development proposing lot sizes less than 1 ha should be subject to a higher degree of scrutiny with respect to Land Capability Assessment and potential for cumulative / off-site impacts. They may also warrant a higher level of operational accountability. This is to ensure domestic wastewater risks that have arisen from historical planning decisions are not repeated and a safe, sustainable benchmark for unsewered subdivision and rezoning is established.

DWC have previously applied the concept of "Useable Land" to provide a basis for increased levels of scrutiny and assessment for unsewered development. Useable Land can be defined as:

total allotment area excluding dams, intermittent and permanent watercourses, wetlands or waterbodies and open stormwater drains and pits in addition to the relevant buffer distances prescribed in the EPA Code of Practice for On-site Wastewater Management.

Where a proposed allotment can demonstrate 4,000 m² of Useable Land, Council can be comfortable that the objectives of the SEPP (WoV) will be achieved subject to typical on-site system design, construction and operational practices. Where this cannot be demonstrated, a higher level of assessment detail and Council scrutiny may be warranted. When used in conjunction with the Land Capability Risk Class, Useable Land enables constrained sites in close proximity to receiving environments to be targeted for this higher level of assessment including cases where site constraints render large portions of an allotment unavailable for effluent management.

It is recommended that the Risk Mapping be used to inform further investigations into land capability and minimum lot sizes for any future development areas.

5.7.4 Risk Based Prioritisation

The results of this risk based assessment are summarised in Figure 18 and Table 12. Further details of the Prioritisation scoring and process is provided in Section 5.6 and Appendix E. The focus of the figure below is ranking of the key high risk areas which have already been flagged by Council, and therefore have area specific system inspection data (compliance and system type) from the System Audit Program (with the exception of Tarrington).

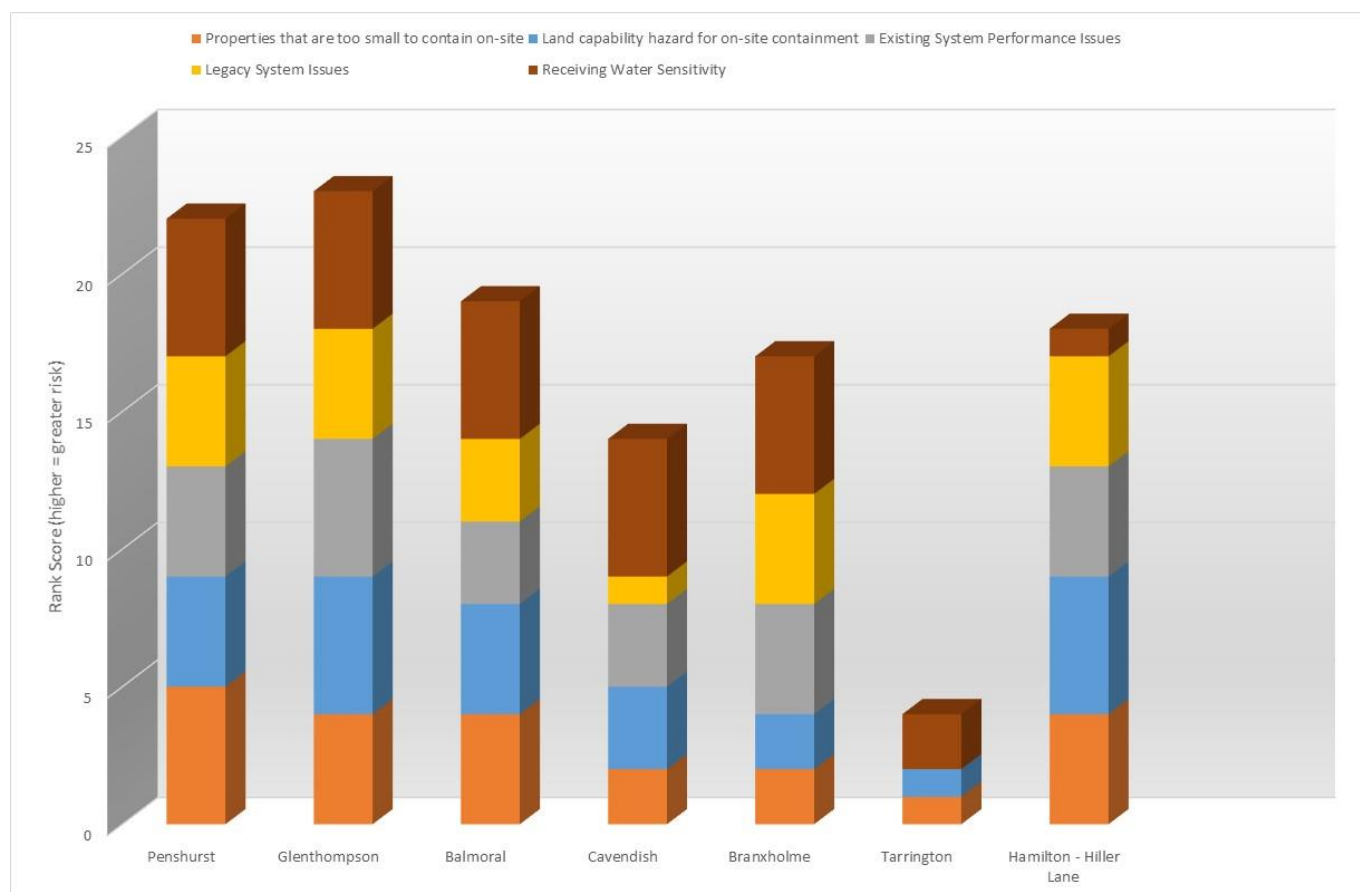


Figure 18 Results of Risk Based Prioritisation Assessment

It can be seen that Glenthompson and Penshurst have ranked highest overall and are within one risk point of each other. Penshurst is a larger township and sits on an environmentally sensitive groundwater environment that is likely to be susceptible to pollution from on-site systems. Glenthompson contains similar percentages of lots that are unlikely to CoS in addition to land capability constraints and a relatively high percentage of major / critical non-compliances.

Hiller Lane (Hamilton) has ranked fourth due to the high proportions of properties both unlikely to be able to contain on site and featuring off-site discharge despite being a small total number of properties. While inspection data is not currently available for Tarrington, lot size and land capability pose lower constraints to on-site containment than the other high priority towns. It is recommended that inspections take place in Tarrington to fully populate this risk assessment. However it is unlikely to alter the ranking.

This prioritisation process has also been applied to other localities across the Shire to help guide the investment of resources in the inspection of remaining on-site systems in the Shire. The key data used in this process was the Land Capability hazard mapping and historical permit / inspection data available. Refer to Table 12 for initial outcomes from this process.

Table 13 Prioritisation of Domestic Wastewater Risk Management Actions

Priority Band	Risk Priority	Township / Locality	Key Actions in this DWMP Period
Very High	1	Glenthompson	Investigate alternative wastewater management solutions or pursue rectification / mitigation of off-site discharge.
	2	Penshurst	Potential follow up inspection in next 1-2 years.
	3	Balmoral	Seek rectification of failures to maximise containment (where possible).
	4	Hamilton – Hiller Lane	Potential water quality monitoring of impact zones.
	5	Braxholme	
High	-	Cavendish	Inspection to confirm existing system type and condition (already undertaken for Cavendish).
		Tarrington	Seek rectification of failures to maximise containment (where possible).
		Hamilton (broader unsewered lots) ¹	Implement finalised Minimum Standards in Appendix B for new Permits and require 3-yearly reports.
		Dunkeld (broader unsewered area) ¹	
		Isolated Non-containment (Non-CoS)	
Medium	-	All other properties <4,000m ² .	Inspection to confirm existing system type and condition.
		Byaduk / Byaduk North	Implement finalised Minimum Standards in Appendix B for new Permits and require 3-yearly reports.
		Rocklands (potable catchment)	
		Mooralla (potable catchment)	
		Konongwootong (potable catchment)	
Low	-	All other localities	Inspect if resources permit.
			Implement finalised Minimum Standards in Appendix B for new Permits and require 3-yearly reports.

Note 1: unsewered lots based on sewer alignment data provided by Wannon Water.

These priority bands are considered an indicative guide to risk priority which can be strongly influenced by the age, type and condition of the existing systems present. A Priority Action has been put forward in Section 6 to investigate options for resourcing an on-going risk based inspection and oversight program.

The outcomes of the Domestic Wastewater risk assessment (as documented in Section 5.6) have identified a number of clear priority townships in terms of managing off-site wastewater impact risks

as can be seen in the table above. In addition, there are some more isolated non-containment properties dispersed throughout other areas that should be inspected as a priority to confirm actual on-site system performance. It is estimated that approximately 10% of unsewered properties in Southern Grampians Shire would be failing to contain wastewater on-site or pose a high risk of non-containment. This is comparable to other council areas and these properties are almost entirely located in the priority townships.

The remaining ~90% of unsewered properties are likely to be able contain on-site subject to adequate on-going management and consideration of site specific land capability constraints. It is recommended that a risk based on-site system inspection program and Minimum Standards are developed for Septic Tank and Planning Permit applications (initial examples of Minimum Standards are provided in Appendix B) to address this. In addition, establish a system to ensure Permit conditions requiring a 3-yearly inspection by a licenced plumber and report to Council would be a relatively simple mechanism for overseeing on-going compliance in these areas.

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6 Domestic Wastewater Management Action Plan

The revised risk assessment documented in Section 5 has been used to identify priority areas and properties for improved wastewater management. Where high proportions of properties are at risk of not containing wastewater on-site, priority actions focus on progressing strategies, potential management frameworks and funding models for some form of managed wastewater service. This Action Plan has been developed within the existing constraints of legislation and state government policy relating to on-site systems, water authorities and land use planning.

In accordance with the SEPP (Waters), where it is not feasible for reticulated sewerage to be provided to a town or area that has been identified as high risk of non-containment, alternative risk management or mitigation strategies should be considered. They form a key component of this Action Plan.

For medium and lower risk areas / properties, actions focus on resourcing and implementing improved levels of oversight for on-site system operation and management. In addition, it is proposed to establish risk based Minimum Standards for Land Capability Assessment, system design and assessment of potential cumulative impacts for new systems and unsewered development to ensure future impacts are avoided.

6.1 Priority Actions

The following Actions are the 'highlight' or priority actions that have been identified through the DWMP process.

6.1.1 Develop and Implement an On-site Wastewater Oversight Program

Of primary importance throughout most of Southern Grampians Shire's unsewered areas is the need for on-going compliance oversight of on-site systems. The intention would be for a grading of inspection frequency and degree of enforcement action based on the broader priority bands presented in this DWMP (Table 13). It is recognised that this oversight regime would need to focus on higher risk properties as per the CoS Hazard Class developed from the land capability mapping layer and existing on-site inspection data (where available).

It is recommended that an initial inspection of all properties (excluding those already inspected) is completed in order of risk priority (see Table 13) for the following purpose.

- To obtain accurate data on type, age, condition, location and size of each system; and
- (Where possible) to engage with the resident on the importance of managing their system, guidance on the 'do's and don'ts' and why Council are conducting inspections.

Once this initial inspection has been completed, Table 14 summarises a recommended inspection / oversight program for SGSC.

Table 14 Proposed On-site Wastewater Oversight Program

Inspection Frequency	Priority Band (See Table 13)	Follow Up on Required Works
Annual	Very High (excluding Non-containment properties ¹). Any property identified as having a major non-compliance requiring rectification ² .	Follow up within 3 months to ensure completion of required works.
Two-yearly	High Risk (excluding Non-containment properties ¹).	Follow up within 6 months to ensure completion of required works (minor non-compliances only).
Three-yearly	Medium Risk Any system with Permit condition requiring a 3-yearly inspection.	Follow up within 12 months to ensure completion of required works (minor non-compliances only).
Five-yearly	Low Risk ³	

- 1. Non-containment properties will be considered as part of development of any whole town solution or mitigation strategy.*
- 2. Major non-compliances typically involve the failure of land application areas and off-site discharge of wastewater that was not originally approved or major structural / operational failure.*
- 3. Where a new system is approved and installed on a Low Risk property, it may be adequate to rely on a 3-5 yearly check by a licenced plumber or drainlayer.*

The biggest challenge for all Victorian council's is the establishment of a long-term funding mechanism for this oversight and enforcement capability. This DWMP includes a small number of potential options for resourcing of the oversight program that will require further examination to confirm feasibility and acceptability to Council and the community.

It is recommended that Council prepare a business case for increased Domestic Wastewater Management oversight that strikes a balance between cost burden on the community, management of risk and fulfilment of Council's legislative obligations. This should include community engagement on both the risks / impacts of on-site systems and seeking feedback on community willingness to pay for improved oversight.

While this business case may not progress to implementation, as a minimum it enables Council to demonstrate it has actively sought to meet its domestic wastewater management obligations under the SEPP (WoV).

Three potential DWMP funding models are currently being considered for Southern Grampians Shire (noting these are to be finalised as part of DWMP implementation).

- Utilise general Council revenue based on the human health and environment protection benefits to the community.

- Increase in Septic Tank Permit fees to allow for oversight of Permit condition compliance.
- Potential establishment of a Local Law to enable a levy to be charged.

There are other, external funding mechanisms that may also be available such as application of a charge associated with septic tank desludging and disposal. Additionally, systems approved since (approximately) 1999 typically have a condition on their Permit requiring three yearly checks by a licenced drainlayer. For these systems, the cost of this inspection would be borne by the property owner. This approach does not always provide the community with the best value for money and can be challenging to enforce and oversee (resulting in higher costs also).

6.1.2 Alternative Wastewater Management Investigation and Pilot Study

The risk assessment documented in Section 5 has identified a number of key areas where the risks of off-site discharge and system failure are elevated. This is the result of smaller lot sizes combined with land capability and receiving environment constraints. For these towns / areas, owner managed on-site wastewater management is highly unlikely to meet regulatory requirements or community expectations for sanitation and environmental protection. Consequently, some form of alternative wastewater management strategy is likely to be required to meet requirements.

Given the isolated nature of these communities, the viability of connection to the Wannon Water sewerage network is likely to be low. Wannon Water confirmed during stakeholder engagement for this DWMP that external funding would be required to enable reticulated sewerage to be provided to these towns. This DWMP does not exclude conventional reticulated sewerage as an option for Very High Risk towns as it remains a highly effective (albeit high cost) solution. However, the recently revised SEPP (Waters) contains a specific requirement for Councils to consider and investigate alternative solutions beyond just reticulated sewerage including non-engineering (i.e. management based) solutions such as centralised management of on-site and cluster wastewater management systems.

Simultaneously, the establishment of the Victorian Integrated Water Management (IWM) Forums across Victoria creates opportunities for local councils, water authorities and other stakeholders to implement IWM solutions and approaches where beneficial. There are a number of local and decentralised approaches to wastewater management and provision of recycled water that fit within the sphere of IWM.

A current project being undertaken by Barwon Water in Forrest is an example where a combination of on-site and cluster technologies in addition to a small reticulation system are being used to maximise management of wastewater within the town, provide a recycled water source and improve liveability (currently constrained by the off-site discharge of greywater). This is somewhat similar to Option 2B (Decentralised Effluent Collection and Treatment) presented in the Branhholme Wastewater Feasibility Study, although a significant advancement in what was proposed. The preferred solution being considered in Forrest involves secondary treatment and subsurface irrigation on each property, with a

small 'effluent' sewer directing excess effluent to a local water reuse facility, for further treatment and controlled irrigation. Importantly it was identified that management of both on-property and off-property infrastructure must be undertaken by a Responsible Management Entity (e.g. potentially Barwon Water) and not the home owners. The project (like the Branhholme study) is highly contingent on external funding given the limited capacity for the community to fund the solution. A case study summary for this project is provided in Appendix D.

There are similarities between the challenges facing each of the Very High Risk towns in Southern Grampians that lend themselves strongly to a more pragmatic, adaptable, IWM approach. This can range from risk mitigation (e.g. capture and treat stormwater containing greywater) through to decentralised solutions that are centrally managed by public and/or private organisations. These challenges are consistently faced by many other local governments not only in Victoria but nationally. SGSC have already been engaging with Wannon Water about the potential for an IWM pilot project that would include providing improved wastewater management for one of the Very High Risk towns.

The risk assessment has identified Glenthompson and Penshurst as high priority areas for improved wastewater management. Initial desktop evaluation as part of the DWMP by DWC indicates that these areas are likely to be well suited to a decentralised solution that may involve partial management on site with excess recycled water managed at a communal facility. This Integrated Water Management approach is consistent with the recent VAGO Audit (2018), in which alternative options are to be investigated where provision of traditional sewerage is not viable. This investigation could be undertaken as a pilot study, similar to that currently underway as part of the Park Orchards Trial Project (via Yarra Valley Water) and in Blackwood (via Moorabool Shire Council).

Yarra Valley Water have currently been trialling upgrade of ~100 on-site systems within Park Orchards as a potential alternative servicing solution. The Blackwood Septic Program involved Moorabool Shire Council and Central Highlands Water funding the upgrade of on-site systems across a number of constrained, high risk properties (within a potable water catchment). This was due to the lack of provision of reticulated sewerage in the area and concern with potential failure of on-site systems.

A pilot scheme would assist in developing a model for the provision of an alternative wastewater management scheme to these high risk areas (and potentially others in the future).

It is recommended that investigations be undertaken in relation to these areas to;

- Design a suitable Pilot Project for a small, representative area that achieves the multiple objectives of improved wastewater management and IWM outcomes;
 - Investigate and identify potential funding, management opportunities, how public health and environmental health risks will be mitigated;
-

- Develop and implement monitoring and evaluation system/program of the alternative wastewater management pilot scheme;
- Pursue grants and other funding sources made available to implement an alternative wastewater management pilot scheme. This would require development of a business case to demonstrate to Government Agencies how this scheme might be implemented.
- Table 15 contains an outline of potential alternative wastewater management strategies and management models that may warrant further investigation as part of DWMP implementation.

Table 15 Potential Alternative Wastewater Management Strategies

Strategy / Model	Description
Managed On-site Wastewater Management Systems	On-site Wastewater management systems upgraded and managed / operated (also potentially owned) by a Responsible Management Entity (RME) such as a water authority, Council or private utility, as discussed in Section 3.6 of the VAGO report (2018) based on US EPA governance model. The Park Orchards Trial project being undertaken by Yarra Valley Water is an example of this.
Decentralised Wastewater System / Cluster Management	System to collect sewage or treated effluent from on-property systems for polishing (potentially Class B) and irrigation across community / public open space. Cluster systems are typically set up at a precinct scale to treat wastewater from a group of properties within the vicinity of the nominated community / public open space. Allows opportunities for on-property reuse of treated wastewater to reduce downstream infrastructure / irrigation requirements. To be operated and managed by RME.
Monitoring and Inspection Program	Program for collection of on-site system type and performance data to guide priority of inspection and compliance assessment.
Integrated Water Management	Water management approach that aims to provide a holistic and forward thinking approach to all elements of the water cycle (movement of water through its various phases) including wastewater in addition to stormwater, potable / non-potable water supply and local watercourses. The intention is for this approach to be adaptive to temporal changes over the long-term and designed in conjunction with end users (community) with a place based element to design. Examples include Best Practicable Option upgrades to existing on-site systems with any excess wastewater not able to be contained on-lot sent to upgraded stormwater infrastructure (biofilters / constructed wetlands).
Funded on-site system upgrade grants.	Seek external funding to assist home owners in system upgrades. The Blackwood Septic Tank Project is one Victorian example of such a project. This project involved Council led Land Capability Assessments and tender / construction oversight. Another example includes the Mount Macedon project. Operation and management of systems continues to be home owner responsibility.
Reticulated (Conventional) Sewerage	Delivery of gravity or low pressure sewer, pump stations and rising main to existing sewerage network or central Water Recycling Plant. Would be delivered and managed by Wannon Water (currently no plans to extend network).

6.1.3 Education and Engagement Program

A number of education and engagement initiatives have been undertaken by SGSC as part of the previous DWMP. These included education sessions undertaken with the community. Septic system education awareness is provided to owners/occupiers/plumbers/service agents during septic onsite inspections, during the Septic Permit and Planning Permit process.

Council's website has been updated since the previous DWMP to outline the Septic Tank Permit Process, buying an unsewered property and provide a copy of all of the township septic system

inspection program reports and presentations, copies of Septic Permit Approval To Install and Certificate To Use are provided to the Septic Permit applicant, owner, plumber and Building Certifier.

Presentations were also undertaken with the community to present the results of the system inspections undertaken as part of Council's Audit Program. The intention of this DWMP is to coordinate a number of additional education and engagement initiatives as part of a co-ordinated and structured Program. This could include;

- Develop a Stakeholder Engagement Plan, which outlines how stakeholders are to work together to better manage domestic wastewater impacts with Southern Grampians.
- Develop and deliver wastewater management system maintenance and good land management practices education material via Council's website, pops up and printed information.
- Promote wastewater management education and septic system data availability to ratepayers, renters, solicitors, real estate agents, building certifiers, architects, engineers, plumbers, builders and other relevant parties.
- Develop and implement documentation to enable these community members to obtain information on properties they have interest in and status of a potential wastewater management system for the site. This is particularly important for the various 'paper lots' throughout the Shire that are currently undevelopable.

6.1.4 DWM Information Collection and Management

Council have been steadily progressing an information audit of Septic Tank Permit data and importation into both Environmental Health and Property Management (electronic record) Systems. This process is critical to improved management of Domestic Wastewater Management (DWM) risks. The DWMP also puts forward some additional options to streamline information collection and management for DWM as new Permit Applications are submitted or system inspection undertaken.

As a starting point it is proposed to investigate the developing of a Council user group to facilitate the integration of Open Office Health Manager wastewater management system data with Council GIS system.

The DWM Hazard Mapping can potentially form the basis for an Area wide information management system for DWM systems. As information is input into Health Manager, it could be also directly updated in a mapping layer on intranet mapping.

6.1.5 Ensuring Future Unsewered Development is Safe and Sustainable

There are a number of localities and areas where on-site containment can be achieved subject to management of constraints. Constraints include slope, incised watercourses and soils with poor suitability for effluent land application.

Section 5.4 and 5.7.3 of this DWMP utilised the DWM Hazard Mapping prepared as part of risk assessment activities to set risk based Minimum Standards for the following (but not limited to) elements of DWM. Indicative examples of these Minimum Standards are provided in Appendix B and will be refined and finalised as part of DWMP implementation.

- Investigation, design and impact assessment requirements for unsewered Planning Permit and Septic Tank Permit applications.
- Triggers for completion of Cumulative Impact Assessments for new unsewered development that considers the impact of land capability of the amount of “useable land” on a site for DWM (as discussed and defined in Section 5.7.3).
- Additional requirements for non-residential DWM systems approved under the Septic Tank Permit system (<5,000 L/day).
- Policy positions for common challenges / constraints that impact on the ability to contain wastewater on-site (e.g. water supply catchments, land stability, bushfire management, flood risk, vegetation protection overlays)
- Risk based Septic Tank Permit conditions for on-going operational compliance requirements.
- Risk based requirements for designer certification of new DWM systems.

Use of the broad scale risk mapping completed as part of this DWMP enables Council to apply consistent requirements with respect to information required to support Permit applications. The risk class from the mapping should not be used to apply prescriptive technology or construction requirements because the mapping remains broad scale. Rather, it can be used to justify higher levels of investigation and design analysis to ensure any potential constraints are detected and addressed.

6.2 Full Action Plan

At present, resourcing for Domestic Wastewater Management (DWM) obligations is limited primarily to Septic Tank Permit application assessment, response to complaints and addressing high risk on-site system failures that pose an immediate health risk. The following Action Plan has been developed with a view to balancing cost of implementation against Council’s DWMP obligations under the SEPP (WoV) and the outcomes of the DWM Risk Assessment documented in Section 5.7. Implementation of the Action Plan will require resourcing beyond the existing situation. Consequently, investigations into potential long-term funding models is identified as a High Priority Action under the DWMP.

Table 16 Southern Grampians Domestic Wastewater Management Action Plan

Action	Action Steps	Responsibility	Resourcing	Timing
High Priority Develop Funding Models for On-site Wastewater Oversight / Compliance Program and Implement (refer to Section 6.1.1)	<ol style="list-style-type: none"> 1. Explore potential funding and governance models and make recommendation to SGSC. 2. Seek approval for funding model. 3. Implementation (prioritised based on On-site System Inspection data analysis and risk). 	SGSC Environmental Health	Allocate 1 day a week to explore this action.	DWMP Year 1 DWMP Year 1 DWMP Year 2
High Priority Pilot alternative wastewater management strategies (in partnership with relevant agencies) for Glenthompson and/or Penshurst	<ol style="list-style-type: none"> 1. Design a suitable Pilot Project. 2. Develop and implement monitoring and evaluation system/program. 3. Engagement between Council, Victorian Government Agencies and Community Stakeholders to identify potential funding and management opportunities. 4. Pursue grants and funding made available to implement an alternative wastewater management pilot study. Requires development of a business case to demonstrate how this scheme may be implemented. 	SGSC SGSC, EPA, Wannon Water, DELWP	Council has allocated money in the 2019/20 budget to explore this action.	DWMP Year 1 DWMP Year 1-2 DWMP Year 3-5?
High Priority DWM Information Collection and Management	<ol style="list-style-type: none"> 1. Investigate developing user group to facilitate the integration of Open Office Health Manager wastewater management system data with Council GIS system. 2. Create a baseline Septic Tank Permit GIS mapping layer. 3. Establish procedure for direct input of all new Permits' data as they are approved. 	SGSC Environmental Health SGSC Environmental Health / IT (+possibly other Councils)	No additional	DWMP Year 1
High Priority Education and engagement program	<ol style="list-style-type: none"> 1. Develop a Stakeholder Engagement Plan, which outlines how stakeholders are to work together to better manage domestic wastewater impacts. 2. Develop and deliver wastewater management system maintenances and good land management practices education material via Council's website, pops up and printed information. 	Decentralised Water Consulting SGSC Environmental Health SGSC Environmental Health	TBC (\$5k-\$10k)	DWMP Finalisation

Action	Action Steps	Responsibility	Resourcing	Timing
	<ol style="list-style-type: none"> Promote wastewater management education and septic system data availability to all relevant community members. Develop and implement documentation to enable these community members to obtain information on properties they have interest in and status of a potential wastewater management system for the site. Develop and deliver information guide on how to consolidate lots. 	SGSC Planning		DWMP Year 1
Moderate Priority Establish Minimum Standards for Septic Tank and Planning Permit Applications	<ol style="list-style-type: none"> Refine, finalise and adopt the Minimum Standards Tables in Appendix B. Engage with neighbouring Councils to work towards consistent septic tank and planning permit application standards. Conduct Consultant and Installer Information Sessions Implement and Update as Required 	DWC SGSC Environmental Health	As part of DWMP Existing budget	DWMP Finalisation DWMP Year 1 DWMP Year 1
Low Priority DWM Impact Monitoring Program	<ol style="list-style-type: none"> Evaluate potential for an on-going water quality monitoring program in high risk areas – potentially leverage off existing data already obtained for Branhholme. 	SGSC Environmental Health	TBC (monitoring program indicatively \$10k-\$40k p.a.)	DWMP Year 3
Low Priority DWMP Action Plan Review	<ol style="list-style-type: none"> On-going evaluation against Action Plan Adapt DWMP Actions as required based on available funding and previous action outcomes. Input (selected) Domestic wastewater Management Plan actions into interplan to track and monitor plan implementation. Full DWMP Review 	SGSC Environmental Health	Existing	Annually Annually DWMP Year 5
Indicative Budget Estimate for DWMP Action Plan Implementation	TBC			

7 References

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EPA Victoria (2016) *Code of Practice for Onsite Wastewater Management*. Publication 891.4.

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Municipal Association of Victoria (2014) *Victorian Land Capability Assessment Framework*.

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Appendix A On-site Containment and Land Capability Risk Assessment Methodology

DRAFT V5

A1 Weighted Hazard Score for Land Capability

Properties with potential for containment on-site (CoS) were classified based on the potential risks and impacts associated with on-going on-site wastewater management. A detailed description of the weighted hazard scoring system is provided in the following tables. There are three Head Criteria used to calculate the overall Land Capability Hazard Score. These scores are determined through direct GIS queries and analysis with the land capability hazard calculated using four sub-criteria.

The methodology has been applied within Victoria as well as NSW for a variety of projects. It is consistent with best practice, the EPA CoP and MAV Land Capability Framework.

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A1.1 Primary Land Capability Hazard Criteria and Risk Framework

*Land Capability Hazard / Risk = (Land capability hazard*0.5) +(Receiving Environment: Proximity*0.25)+(Receiving Environment: Sensitivity*0.25)*

Head Criteria	Classification	Hazard	Score	Weight	Description
Land capability hazard	Hazard score <0.95 in Land Capability hazard score	Low	0	50%	Few / minor land capability constraints to on-site wastewater management.
	Hazard score >=0.95 and <2 in Land Capability hazard	Medium	1		Some moderate land capability constraints to on-site sewage with potential to increase failure rates
	Hazard score >=2 in Land Capability hazard score	High	2		Significant land capability constraints which have a high potential to increase failure rates
Receiving Environment: Proximity	Property outside of setback area	Low	0	25%	Limited to no proximity risk
	Receiving environment setback intersects boundary	Medium	2		Risk may be elevated, particularly where other constraints exist or COS is marginal
	Receiving environment itself intersects boundary	High	3		High risk - careful design and oversight required as likelihood of impact high in failure event
Receiving Environment: Sensitivity	None present / >setback distance	Low	0	25%	Self-explanatory – acceptable risk
	Stormwater drain				Typical swale drains on street or piped system
	Degraded or cleared intermittent drainage line.				Gully lines with predominantly grass cover and some scattered trees and shrubs.
	Dam / small waterbody (Upslope)	Medium	2		Farm dams possibly used for irrigation of edible crops or watering livestock
	Partially vegetated / rehabilitated ephemeral waterways (Upslope)				Some ecosystem value, seeking to not degrade further.
	Open stormwater drains in public places				Adjacent to and within parks, reserves, schools, shops.
	ESO vegetation communities (non-riparian)				Non-riparian ESO (or bioregion) polygons
	Non-potable groundwater bore				Domestic stock and irrigation bores from available data
	Potable water supply catchment	High	3		Protection of human health (priority)
	Potable groundwater bore				Protection of human health (priority)
	Permanent watercourse / waterbody (Upslope)				Perennial or near perennial streams and rivers, or large lakes and reservoirs.
	ESO (high value) aquatic ecosystems				Riparian polygons of ESOs and bioregions

ESO = Environmental Significance Overlay;

LAA=Land Application Area

A1.2 Land Capability Hazard Sub-criteria

Land capability hazard score equation is as follows and is used to calculate this hazard as per the table above (Low, Medium or High Hazard).

$$(Slope\ hazard*0.4)+(Soil\ hazard*0.3)+(Drainage\ Hazard*0.1)+(Climate*0.2)$$

Criteria	Value	Hazard	Score	Weight	Notes
Slope (area weighted average)	<10%	Low	0	40%	No impact on design or function
	10-15%	Medium	2		Some constraints to land application, breakout risks
	15-30%	High	3		High risk of design failure or effluent breakout
	>30%	Prohibitive	Prohibitive		Land application prone to failure regardless of management (Very High Hazard)
Soil	<1.5	Low	0	30%	Soil hazard was assessed and calculated as per BMT WBM (2012, 2015a & 2015b).
	1.5-2.5	Medium	2		
	>2.5	High	3		
Climate	≤3 months where RF > PET	Low	0	20%	Monthly average rainfall exceeds potential evapotranspiration only for a small number of months.
	4 to 5 months where RF > PET	Medium	1		Rainfall exceeds potential evapotranspiration for close to half of the year.
	≥6 months where RF > PET	High	2		Rainfall exceeds potential evapotranspiration for half or greater of the year (soils expected to be consistently moist).
Drainage Class	>Mod. well	Low	0	10%	Free draining soils, ridges, upper and mid slopes
	Imperfect	Medium	1		Imperfectly drained soil profiles, lower slopes (footslopes)
	<Poor	High	2		Poorly drained landscapes, depressions, water accumulation, swamps, floodplains

A1.3 Red flags

The need for a number of “red flags” was identified during groundtruthing and development of the Framework. Red flags represent more significant or extreme conditions associated with a specific criterion that have a significant and in some cases prohibitive impact on the ability to CoS.

Table 17 CoS Hazard Red Flags

Occurrence	Outcome	Purpose
Land capability = High	CoS Hazard Class = High automatically assigned.	Avoid significant and extreme (e.g. steep slopes and shallow soils) constraints on large lots that are not close to sensitive environments from being diluted.
Lot size <4,000m ² = High		These sites will be highly dependent on site specific land capability constraints and proximity to sensitive receiving environments. A more detailed LCA and design process is likely to be required to ensure full containment in addition to higher level treatment and greater construction and operational oversight.
Receiving environment proximity = High		Capturing otherwise unconstrained lots that either contain or are immediately adjacent to sensitive receiving environments (i.e. if failure occurred there is limited assimilative capacity).
Receiving environment sensitivity = High		As above but capturing the need for greater vigilance where an on-site system is close to a high value or highly sensitive receiving environment (e.g. potable water supply catchment).

A2 Receiving Environment Analysis

Receiving Environment hazards were assigned the relevant Sensitivity hazard (as defined in 0 above) and applied to each of the unsewered properties within the LGA which contained the individual hazard. A Receiving Environment Proximity hazard of 3 (high) was applied to each property in which the relevant hazard polygon or line intersected the property boundary. If the Receiving Environment (RE) hazard buffer (setback) area intersected the property boundary, a RE Proximity hazard of 2 (medium) was assigned. The flooding and ESO hazard layers were not buffered and therefore were assigned a uniform RE Proximity hazard of 2 (medium). For very large lots >40ha, the hazard for any watercourses and waterbodies within these lots was reduced (to medium) given the very high likelihood that a land application area could be installed with sufficient setback to these hazards. Details of each of the specific RE constraints which were considered are discussed below.

A2.1 Watercourses

The watercourse layer ('Hydroline') was found to correlate quite well with intermittent waterways and drainage lines across the LGA. Therefore, these were buffered by 30 metres (EPA CoP setback distance) and given the appropriate Receiving Environment Sensitivity hazard (Medium). The watercourse layer also correlated well with permanent waterways within the LGA and this was buffered by 60 metres and given an increased RE Sensitivity hazard (High). For properties ≥4,000m² in which an intermittent watercourse is within the property boundary a Medium RE Proximity hazard was assigned to capture the improved ability for a land application area to be located on larger lots

with sufficient setback to this constraint. The standard High RE Proximity hazard was assigned if the property was $<4,000\text{m}^2$.

A2.2 Waterbodies

Dams and other waterbodies were mapped within the 'Hydroarea' layer provided by Victorian Government data portal. Due to the generally flat nature of the area, a large number of drainage depressions and low lying areas were also mapped within the waterbodies data. As these low lying areas would periodically be flooded and filled with water they were included within the hazard mapping. Small waterbodies (e.g. farm dams) was buffered by 30 metres and assigned a Medium RE Sensitivity hazard whilst larger waterbodies were buffered by 60 metres and assigned a High RE Sensitivity hazard. For properties $\geq 4,000\text{m}^2$ in which a small waterbody (farm dam) is located within the property boundary a Medium RE Proximity hazard was assigned (as discussed above for watercourses). High RE Proximity hazard was assigned if the property was $<4,000\text{m}^2$.

A2.3 Groundwater

Groundwater bore locations were sourced from the Victorian Government online data portal ('NGIS_Bores'). All bores known to be potable water sources were buffered by 100 metres and assigned with a High RE Sensitivity hazard. There is some uncertainty around currency, accurateness and completeness of groundwater bore data and therefore bores assigned as non-potable or unknown were not included (given the board-scale nature of the mapping).

A2.4 Environmentally Significant Vegetation

The Council planning overlay was used to extract areas classified specifically as part of the 'Environmental Significant Overlay' (ESO). This was combined with the 'Native Vegetation – Bioregional Conservation' layer obtained from Vic Gov data portal. No buffer was applied to this combined ESO / Bio-conservation region and therefore it is assigned a uniform RE Proximity hazard of 2 (medium).

In order to identify high value (Riparian) ESO / Bio-conservation areas, permanent watercourses (with 30m buffer applied) was used to identify these areas and assign a High (3) RE Sensitivity hazard to any properties within this region. All other ESO / Bio-conservation areas were assigned a Medium (2) RE Sensitivity hazard.

A2.5 Flooding

Flood risk areas were identified via the Council planning overlay to determine properties within the 'Floodway' or 'Land subject to inundation' planning regions. Council also had access to specific flood layers for a small number of towns and this was included. Properties that were within these areas were assigned a medium RE Proximity hazard (and therefore minimum Medium Hazard classification) to flag this potential land capability constraint for installation of a suitably sized on-site wastewater management system.

A2.6 Stormwater

Some stormwater drainage infrastructure data was available, however Council's confidence in the coverage and accuracy of this dataset was low. Therefore it was not used within the hazard based on this feedback from Council.

A3 Soil Hazard

Soil hazards relevant to on-site wastewater management have been evaluated using the parameters / system documented in the tables below.

Broad-scale soil and land capability assessment was previously undertaken by Deakin University in 2014 for SGSC and is available via Council's online mapping service. This data was not available in GIS or another format, however soil classification as part of this has been based on similar data as was used for this assessment (as confirmed with Deakin University). This consists of the best available broad scale soil landscape mapping and data for the region, predominately based on the 'Glenelg Hopkins' soil mapping and data compiled by Department of Natural Resources and Environment (data obtained via Department of Jobs, Precincts and Regions web portal).

Groundtruthing field verification includes completion of soil investigations across Southern Grampians Shire at a number of representative locations. The focus was on the key / dominant soil landscapes and areas where there was uncertainty around soil characteristics and/or soil hazard was important for the overall Hazard Class. This also included collection of soil samples for laboratory analysis for a number of key soil landscapes.

Table 18 Parameters for Soil Hazard Derivation

Hazard Type	Parameter	Hazard Class	Description
Depth Hazard	Profile Depth	Low	Greater than 1.5 metres profile depth
		Medium	0.8 – 1.5 metres profile depth
		High	Less than 0.8 metre profile depth
Hydraulic Hazard	Texture	Low	Pedal loam to clay loam soils with mid-range permeability and moderate to free drainage.
	Structure	Medium	Generally imperfectly drained, weakly structured clay loams and light clays or deep, rapidly drained sands (e.g. sand hills).
	Indicative Permeability	High	Generally, shallow, structureless clays and sands in either very rapidly or very poorly drained landscapes.
	Drainage		
Pollution Hazard	Nutrient Retention	Low	Generally, soils with high cation exchange (CEC) and / or phosphorus sorption capacity, no sodicity potential and good organic content in topsoil.
	Sodicity	Medium	Generally, soils with moderate CEC, phosphorus sorption capacity, minor sodicity potential and moderate organic content in topsoil.
	Organic Content	High	Generally, soils with low CEC, phosphorus sorption capacity, sodicity potential and/or limited organic content.

Table 19 Weighted Average Logic for Soil Hazard Class

Hazard Score	Hazard Type	Weighting	Calculation
Low=1	Depth	1.5	Final Hazard Class $= [(Depth\ HS \times w) + (Hydraulic\ HS \times w) + (Pollution\ HS \times w)] / 3$ Weighted average hazard classes 1 – 1.5 = Low Soil Hazard 1.5 – 2.5 = Medium Soil Hazard 2.5 – 3 = High Soil Hazard
Medium=2	Hydraulic	1	
High=3	Pollution	0.5	

A4 Slope and Drainage Hazard

Elevation contours (2 metre) were available for the Shire as made available by SGSC. Contours and slope grid were also created within QGIS based on the Vicmap 20m Digital Terrain Model (DTM) available for the entire area. This assisted with evaluation of topographical, hydrologic and landscape constraints. The slope grid created from the DTM provided a broad desktop assessment of variability in slope, from which assumptions were evaluated and verified during groundtruthing. Slope was not found to be a major land capability constraint as a large proportion of the Shire is relatively uniform in

slope (certainly in comparison to other areas in which this hazard mapping methodology has been applied e.g. Yarra Ranges).

The drainage hazard was inferred from the general geomorphology (Victoria Gov. data) and soil atlas data layers based on identifying board areas in which poor drainage was likely to be a constrain to effluent management. The High Drainage Hazard areas predominately consisted of low-lying floodplains with incised watercourses present.

A5 Climate Hazard

A general climate analysis across the LGA was undertaken to provide an assessment of the degree to which climate limits or enhances opportunities for the land application of effluent. The Climate Hazard analysis classifies the Shire based on the number of average climate months where rainfall exceeds potential evapo-transpiration (PET).

This provides a general spatial representation of periods where enhanced deep drainage or surface surcharging of effluent is more likely to occur because evapo-transpiration is providing limited or no assistance in assimilating wastewater. Conversely areas (grid cells) with limited or no average months where PET is greater than rainfall generally represent sites with good evapo-transpiration capacity available for effluent assimilation.

The baseline data layers used include;

- 2.5 km² grid of mean monthly rainfall (Bureau of Meteorology Climate Atlas)
www.bom.gov.au/climate/averages/climatology/gridded-data-info/metadata/md_ave_rain_1961-90.shtml
- 10 km² grid of mean monthly areal Potential Evapo-transpiration (BoM Climate Atlas)
http://www.bom.gov.au/climate/averages/climatology/gridded-data-info/metadata/md_ave_et_1961-90.shtml

The rainfall and evapotranspiration data for each month were converted from lat/long co-ordinates to an MGA projection and then converted to a 40m grid cell size for consistency.

The final output of the RF minus PET monthly grid analysis was an approximation of excess rainfall for each month of an average statistical year. The results of this were used to determine an appropriate spatial climate hazard level across the LGA.

The climate hazard layer was created through classification of grid cells in accordance with the following conditions.

Low hazard: ≤ 3 months where $RF > PET$

Medium hazard: 4 to 5 months where $RF > PET$

High hazard: ≥ 6 months where $RF > PET$

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Appendix B Minimum Standards – Septic Tank Permits & Subdivision

Domestic Septic Tank Permit

The flow chart below outlines the pathway for assessing a septic tank permit for a new domestic system or alternation to an existing system. The Minimum Standards for assessment and design are dependent on the Land Capability Hazard Class for the specific unsewered domestic site. An example minimum standards checklist is presented below in Table 20 for Low to Medium Hazard sites. The intention is that a consultant can undertake a simple domestic wastewater system design and report provided the Minimum Standards are achieved. In addition, example minimum standards for properties classified as High / Very High Hazard and Non CoS (and where Low / Medium minimum standards are not achieved) is presented below in Table 21.

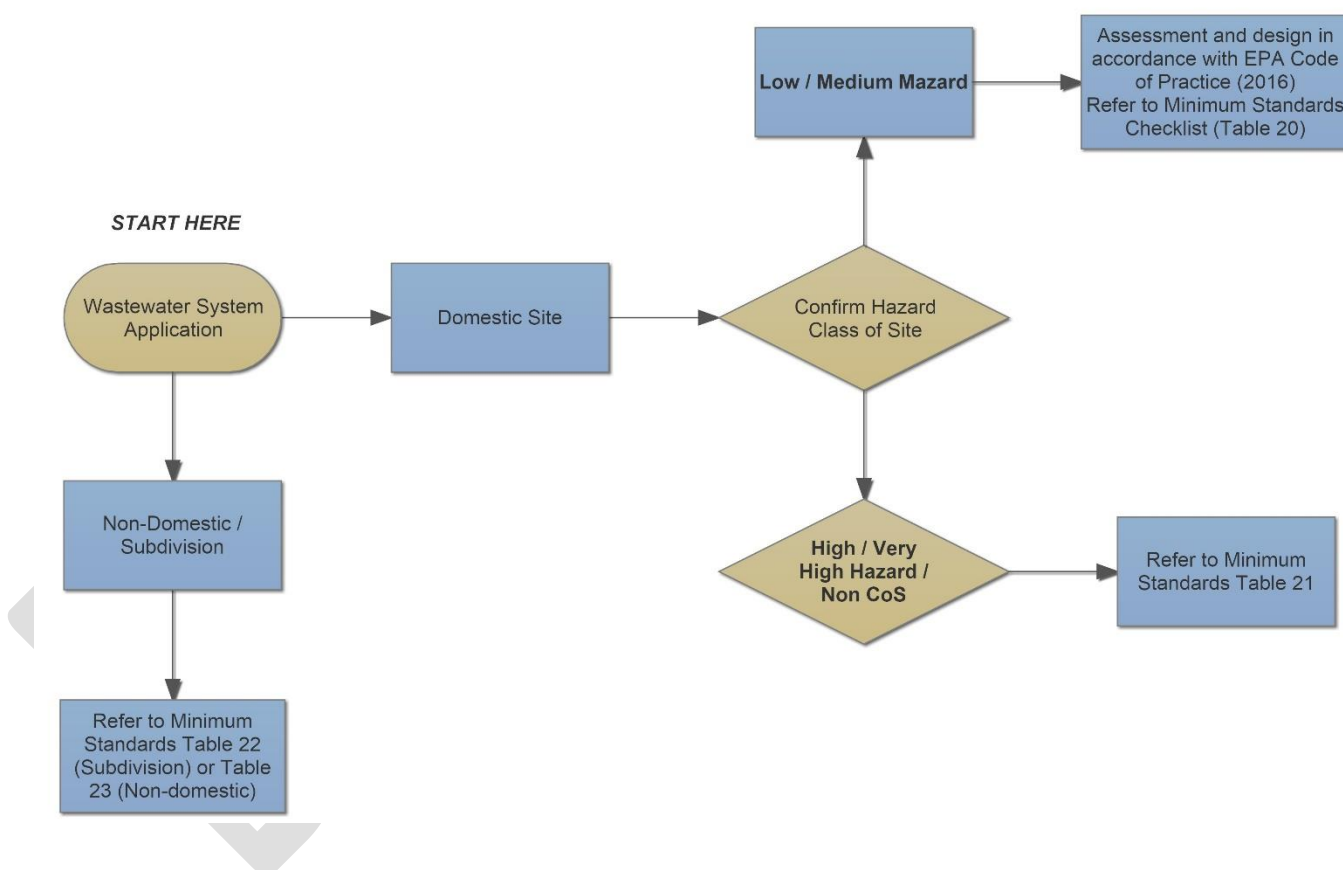


Table 20 Low / Medium Hazard Minimum Standards

1. Site Assessment	Low / Medium Hazard	
	Limit	Comply (tick or cross)
Aspect/exposure of disposal area (sun and wind)	Moderate/High	<input type="checkbox"/>
Slope of disposal area	<20%	<input type="checkbox"/>
Flooding – is the property flood prone?	> 1 in 20 year ARI	<input type="checkbox"/>
Depth to bedrock or hardpan?	> 0.6metres	<input type="checkbox"/>
Depth to groundwater?	> 0.6metres	<input type="checkbox"/>
Dam, lake, reservoir or bore (potable water supply catchment) – <i>Upslope</i>	> 300metres	<input type="checkbox"/>
Groundwater bore – distance to disposal area?	> 60 metres	<input type="checkbox"/>
Permanent waters (potable water supply) – distance to disposal area?	> 100 metres	<input type="checkbox"/>
Permanent waters (non-potable water supply) – distance to disposal area?	> 60 metres	<input type="checkbox"/>
Dams, drains, intermittent watercourses – distance to disposal area?		<input type="checkbox"/>
Vegetation - removal for disposal area?	No	<input type="checkbox"/>
Any other health or environmental constraints specific to the property?	No	<input type="checkbox"/>
Soil classification (<i>AS/NZS 1547:2012</i>)	Cat. 1-5	<input type="checkbox"/>
<p>Applications must be assessed under the High Hazard Minimum Standards where site specific investigations confirm a failure to meet any of the criteria in this table.</p> <ol style="list-style-type: none"> 1. Slope may be estimated visually. 2. Subsurface criteria must be assessed through excavation of at least one soil test pit within the proposed land application area(s). 3. Soil classification shall be conducted through textural analysis as described in Appendix E of <i>AS/NZS1547:2012</i>. 4. Failure to declare obvious property constraints may trigger additional investigation requirements. 		

Table 21 Minimum Standard for Wastewater Management Reports: High / Very High Hazard and Non CoS Lot

SINGLE ALLOTMENT (Domestic)		
Minimum Standard for Wastewater Management Reports		
Report Element	Minimum Standard	Nominal Level of Detail
Introduction and Background	<ul style="list-style-type: none"> Name, contact details and qualifications of author(s). Site location and owner. Allotment size (m² or ha). Proposed / existing water supply. Number of bedrooms and occupants. Availability of sewer. 	One page of text and tables.
Site and Soil Assessment	<ul style="list-style-type: none"> Broad overview of locality and landscape characteristics. Details of the date and time of assessment in addition to statements confirming the methods used to complete the assessment. Site and soil assessment accordance with MAV Land Capability Assessment Framework (2014), <i>AS/NZS 1547:2012</i> and EPA Code of Practice 2016 (CoP). Summary of available published soils information for the site. Detailed explanation of the implications of observed site and soil features for system design and performance. Assessment of the existing condition of the receiving environment and sensitivity to on-site system impacts. Setbacks to be met as per EPA CoP. 	<ul style="list-style-type: none"> Paragraph and locality map. Paragraph or table Table(s) 1-2 paragraphs Up to 1 page of explanation and recommended design elements to overcome constraints. Up to one page.
System Selection	<ul style="list-style-type: none"> Summarise potential treatment and land application systems considered including advantages and limitations. Preliminary design calculations for a minimum of 2-4 options. Brief statement justifying selection of treatment and land application system. 	<ul style="list-style-type: none"> Table. Summary table. Paragraph.
Design	<ul style="list-style-type: none"> Site specific calculation of design wastewater generation rates in accordance EPA CoP accompanied by water use / wastewater generation data to support design rates for all existing systems upgrades. Certification details for the selected treatment system. Land Application Area (LAA) sizing in accordance with EPA CoP and MAV (2014); <ul style="list-style-type: none"> Trench / Bed: most limiting of monthly water balance and annual nutrient balance calculations (EPA CoP). Surface / Subsurface Irrigation: most limiting of hydraulic sizing equation (Eq. L1 <i>AS/NZS 1547:2012</i>) and annual nutrient balance calculations (EPA CoP). Hydraulic design calculations for all pressurised pipework (including drip irrigation). Design drawings of all non-certified system components. 	<ul style="list-style-type: none"> Tables and paragraph justifying calculations. Attach Certificate Table summarising inputs and assumptions accompanied by a summary table of results. A4 schematic (not to scale). A4 schematic (not to scale).
Site Plan	<ul style="list-style-type: none"> Nominated Effluent Management Area (EMA) to be clearly shown to ensure construction does not occur over this area at any time; Survey plan; Location of tank(s); Location of boundaries, buildings, swimming pools, paths, groundwater bores, dams and waterways; Location of primary and reserve disposal areas; Location of stormwater diversion drains and earth bunds (if applicable); Setback (buffer) distances to the above features; Two metre elevation contours; 	<ul style="list-style-type: none"> A4 Site Plan (1:500 scale minimum).

	<ul style="list-style-type: none">• Location of drainage pipework (centreline).	
Appendices	<ul style="list-style-type: none">• Soil bore logs for all test pits (Permeability test results).• Raw laboratory results for soil analysis.• All design calculations and assumptions.	-

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Subdivision

The same Minimum Standards will be required for all new subdivision regardless of the specific properties Land Capability Hazard Class. An example table is presented below.

Table 22 Minimum Standard for Wastewater Management Reports (Subdivision)

INCREASE IN BUILDING ENTITLEMENTS Minimum Standard for Wastewater Management Reports		
Report Element	Minimum Standard	Nominal Level of Detail
Introduction and Background	<ul style="list-style-type: none"> • Name, contact details and qualifications of author(s). • Site location and owner. • Allotment size (m² or ha). • Proposed / existing water supply. • Number of new building entitlements. • Availability of sewer. 	One page of text and tables.
Site and Soil Assessment	<ul style="list-style-type: none"> • Broad overview of locality and landscape characteristics. • Details of the date and time of assessment in addition to statements confirming the methods used to complete the assessment. • Site and soil assessment accordance with MAV Land Capability Assessment Framework (2014), <i>AS/NZS 1547:2012</i> and EPA Code of Practice 2016 (CoP). • Detailed review of available published soils information for the site. • Where multiple soil facets are present the site plan should show the approximate boundary between facets. • Detailed explanation of the implications of observed site and soil features for system design and performance. • Assessment of the existing condition of the receiving environment and sensitivity to on-site system impacts. Confirm setbacks are met as per EPA CoP. 	<ul style="list-style-type: none"> • Paragraph and locality map. • Paragraph or table • Table(s) • 1-2 paragraphs • Minimum 3 soil test pits per soil facet. • Up to 1 page of explanation and recommended design elements to overcome constraints. • Up to one page.
System Selection and Design	<ul style="list-style-type: none"> • Summarise potential treatment and land application systems considered including advantages and limitations. • Brief statement justifying selection of potential treatment and land application systems. • Sizing of land application systems using the most limiting of monthly soil water and annual nutrient balances (EPA CoP / MAV 2014 and <i>AS/NZS 1547:2012</i>). 	<ul style="list-style-type: none"> • Table. • Paragraph. • Table summarising inputs and assumptions accompanied by a summary table of results and paragraph justifying calculations.
Site Plan	<ul style="list-style-type: none"> • Useable Land to be clearly identified; • Survey plan; • Proposed allotment boundaries, dimensions and area; • Location of existing buildings, swimming pools, paths, groundwater bores, dams and waterways; • Location of exclusion zones (e.g. setback distances and unsuitable site and soil conditions); • Location of EMAs capable of containing LAAs and reserves (where applicable); • Two metre elevation contours; and • Location of existing and proposed drainage pipework (centreline). 	<ul style="list-style-type: none"> • Minimum Site Plan (1:500).
Off-site Impacts (Where required)	<ul style="list-style-type: none"> • Confirm Useable Land (UL) and if Setbacks are achieved for each new lot (as per EPA CoP). <ul style="list-style-type: none"> ◦ ≥4,000m² UL within each new lot and all setbacks achieved – No further works required 	<ul style="list-style-type: none"> • Up to 1 page.

	<ul style="list-style-type: none"> ◦ <4,000m² UL within a new lot or EPA CoP setbacks cannot be achieved – Site specific Land Capability Assessment required in accordance with MAV (2014) and EPA CoP. • Methodology documenting the basis and source of input data including reference to site specific data and published information to justify use. • Results demonstrating compliance with local water quality objectives and adequate management of health risk as per EPA CoP. • Brief discussion of long-term risks to health and environment and recommended management measures to address impacts. 	<ul style="list-style-type: none"> • 2-4 pages of tables, figures and text. • 1-2 pages of tables, figures and text. • Up to 1 page.
Appendices	<ul style="list-style-type: none"> • Soil bore logs for all test pits. • Raw laboratory results for soil analysis. • All design calculations and assumptions including screenshots of off-site impact spreadsheets/models (if required). 	-

Non-domestic System (<5,000 L/day)

The same Minimum Standards will be required for all non-domestic systems regardless of the specific properties Land Capability Hazard Class. An example table is presented below.

Table 23 Minimum Standard for Wastewater Management Reports (Non-Domestic System)

NON-DOMESTIC SYSTEMS (ADWF <5,000 L/day)		
Minimum Standard for Wastewater Management Reports		
Report Element	Minimum Standard	Nominal Level of Detail
Introduction and Background	<ul style="list-style-type: none"> Name, contact details and qualifications of author(s). Site location and owner. Allotment size (m² or ha). Proposed / existing water supply. Description of proposed facility (including equivalent persons). Availability of sewer. 	One page of text and tables.
Site and Soil Assessment	<ul style="list-style-type: none"> Broad overview of locality and landscape characteristics. Details of the date and time of assessment in addition to statements confirming the methods used to complete the assessment. Summary of available published soils information for the site. Site and soil assessment accordance with MAV Land Capability Assessment Framework (2014), <i>AS/NZS 1547:2012</i> and EPA Code of Practice 2016 (CoP). Brief and clear explanation of the implications of observed site and soil features for system design and performance. Assessment of the existing condition of the receiving environment and sensitivity to on-site system impacts. Confirm setbacks are met as per EPA CoP. 	<ul style="list-style-type: none"> Paragraph and locality map. Paragraph or table 1-2 paragraphs Table(s), minimum 3 soil test pits per soil facet. Bullet point list of recommended design elements to overcome constraints. 1-2 paragraphs
System Selection	<ul style="list-style-type: none"> Summarise potential treatment and land application systems considered including advantages and limitations. Brief statement justifying selection of potential treatment and land application systems. 	<ul style="list-style-type: none"> Table. Paragraph.
Design	<ul style="list-style-type: none"> Site specific wastewater characterisation based on best available published or local information including consideration of seasonal / monthly variation. Establish site specific design criteria based on typical / published performance. Brief process design outlining rationale, assumed performance and capacity to manage design flows and loads. Process performance should be supported by published data or information that demonstrates the suitability of the process to the site and development. Sizing of land application systems using the most limiting of monthly soil water and annual nutrient balances (EPA Code and <i>AS/NZS 1547:2012</i>). Off-site impacts assessment may be required if setbacks (as per EPA Code and <i>AS/NZS 1547:2012</i>) cannot be achieved – at discretion of Council. Preliminary hydraulic design of collection, treatment and land application components. 	<ul style="list-style-type: none"> Seasonal / monthly time series of flow and loads and 1-2 paragraphs + table justification. Paragraph and bullet points. 1-2 pages including supporting tables and figures. Tables summarising inputs, assumptions and results and paragraph justifying calculations. Tables and process schematic.

Site Plan	<ul style="list-style-type: none">• Location of boundaries, buildings, swimming pools, paths, groundwater bores, dams and waterways;• Location / extent of all system components (including any reserve areas);• Two metre elevation contours; and• Location of existing and proposed drainage pipework (centreline).	<ul style="list-style-type: none">• Minimum Site Plan (1:500).
Appendices	<ul style="list-style-type: none">• Soil bore logs for all test pits.• Raw laboratory results for soil analysis.• All design calculations and assumptions including screenshots of off-site impact spreadsheets/models (if required).	-

Appendix C Minimum Property Size Analysis

A review was undertaken of sustainable minimum property sizes for on-site sewage management based on collated data for a number of unsewered regions across Victoria and New South Wales, some which are similar to Southern Grampians Shire. Sustainable minimum lot size was previously considered to allow for typical levels of site development (based on applicable land use zoning) in addition to a conservatively sized land application system (using hydraulic and nutrient balances) and provision of adequate separation distances from sensitive receptors.

The intention of these previous assessments was to establish a conservative lot size (or some other measure) that was considered adequate to provide Council with a high degree of confidence that an effective, safe and sustainable on-site sewage management service can be accommodated (with factors of safety).

C1 Methodology

Based on previous studies and experience, a conservative land area requirement for sustainable on-site sewage management has been calculated by the following procedure. The procedure was applied using rainfall from local stations and gridded potential evapo-transpiration data from Bureau of Meteorology (BoM).

- A design occupancy of 6 persons for a 4 bedroom house (using reticulated water) was adopted to represent the typical design residential development scenario.
- A typical system configuration of secondary treatment and subsurface irrigation was assumed. This scenario also allowed for primary dosed trenches and beds (discussed further below).
- Hydraulic and annual nutrient balance was undertaken based on the above occupancy assuming a Design Loading Rate (DLR) of 3 mm/day (Category 5 – light clays). This DLR was selected on the basis that it strikes an appropriate balance between conservatism and realism.

The outcomes of these water and nutrient balance calculations were then used to examine minimum Effluent Management Areas (EMA) required for the majority of typical sites and dwellings likely to be encountered.

An assessment was then undertaken of a sample of properties within unsewered zones of the LGA's. Properties were assessed to determine the capacity to provide available area for sewage management in addition to area occupied by development and separation distances from objects such as;

- building structures;
 - driveways and paths;
 - swimming pools and other dedicated recreational areas (e.g. tennis courts);
-

- land occupied by livestock or horses;
- property boundaries; and
- dams, intermittent and permanent watercourses.

The assessment was undertaken through orthophoto investigations and GIS creation of buffers around the abovementioned objects. Statistics on the area of land and proportion of total lot area occupied by each component (inclusive of buffers) were recorded for analysis. The lots assessed were selected to provide a representative sample of typical development across a variety of unsewered areas. The data also consists of ~800 lots in Monbulk in which site specific available area for effluent management was measured on-property.

Statistics obtained from the assessments were analysed to identify any patterns or relationships between lot size, land use zones and area available for EMA's. Multiple scatter plots of lot size and the average area available for effluent management were created. This was completed for a number of property size ranges to determine relationships for these property ranges that could be applied region wide. Data were utilised from many previous assessments across Victoria and New South Wales and provided a consistent relationship.

C2 Data Analysis

Based on the outcomes of previous water (checked against annual nutrient balances) balance assessments, an LAA of 650 – 850 m² has typically been required. The "design" estimate (outlined in points 1 – 3 above) based on the more conservative climate zone resulted in a minimum land application area of approximately 850 m². Allowing for treatment tanks, required zoning of LAAs and other infrastructure required for an on-site system, a typical EMA was found to be **~1,000 m²**. Primary dosed trenches and beds (which are not always suitable for observed site and soil conditions) occupy approximately half the land area of a secondary dosed irrigation system. However, allowance for a reserve area must be made for primary dosed subsurface systems which results in a comparable land area requirement to that of a secondary dosed irrigation system.

The larger footprint is considered appropriate for planning purposes and allows for situations where issues such as irregular shaped areas and slope limit the proportion of available land that can actually be occupied by a land application system. It is important to note that the outcomes of this minimum property size assessment should not be used in a prescriptive or deterministic fashion. Individual applicants should be able to undertake additional site specific investigations to confirm the appropriateness of Council's general minimum lot size for their site.

The relationship between Lot Size and Available Area for Effluent Management for the various areas assessed was compared based on adoption of an average available area approach which was found to be more applicable and more adaptable to the study areas considered. This involved determining

the relationship between average available area and property size at various size ranges. The figure below contains the results of this consolidated analysis.

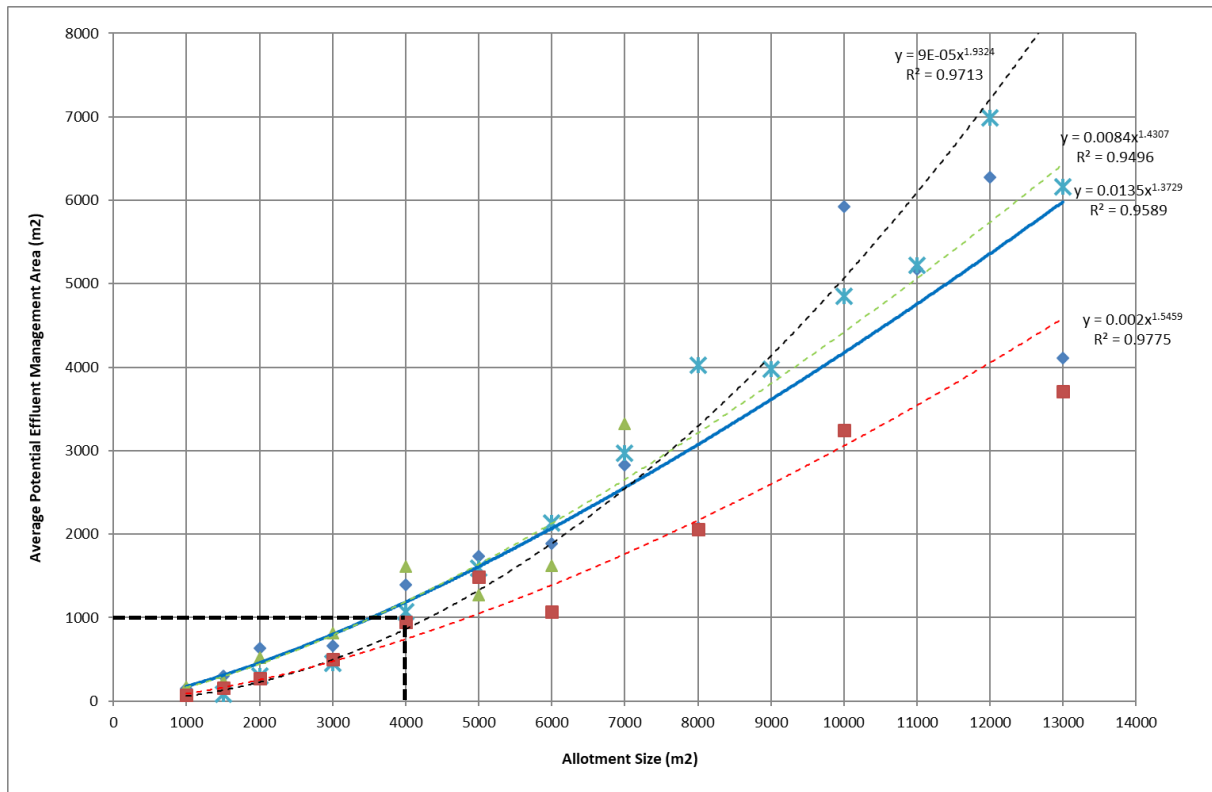


Figure: Average Available Area and Property Size Evaluation

The extensive data collated consistently indicated that lot sizes at or greater than 4,000 m² are likely to be capable of fitting a sustainable on-site sewage management system within the property, assuming aspects such as native vegetation protection can be managed through site specific design and communication between relevant Council staff.

Appendix D Forrest Wastewater Investigation Case Study

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Improved Wastewater Solution for Forrest

The Forrest District and Community Association approached the Victorian Water Minister in late 2016 to raise concern about wastewater issues that were affecting the town. Barwon Water (BW) and Colac Otway Shire Council (Council) partnered with the Forrest Community (the Community) to investigate opportunities for wastewater management improvements in the township. Wastewater is currently managed by home owners via individual on-site wastewater management systems (on-site systems) with approval and performance regulated by Council. Community feedback told of a range of system issues which is exacerbated during peak tourist periods (Forrest is a popular location for bike riding).

Investigations have been underway since September 2017. Initial audits undertaken of existing on-site systems which confirmed there was indeed a problem across the township. The investigation included an assessment of a Business as Usual scenario involving continued reliance on poorly performing, owner managed on-site systems. It was determined that the township was currently (and would continue to be) well below the World Health Organisations target for Disease Protection due to discharge of wastewater off-site (four times below the WHO threshold).

Community consultation was undertaken to determine a Project Vision and Measures of Success to clearly articulate what a particular solution for Forrest might look like and what would need to achieve. A number of potential solutions were then developed with the community and formulated into four clear Solution Packages (SP's) for Forrest. These SP's were then assessed against this Vision and these Measures of Success via a Multi Criteria Analysis (MCA). This included the development of initial cost estimates for each Package (Capital and Lifecycle).

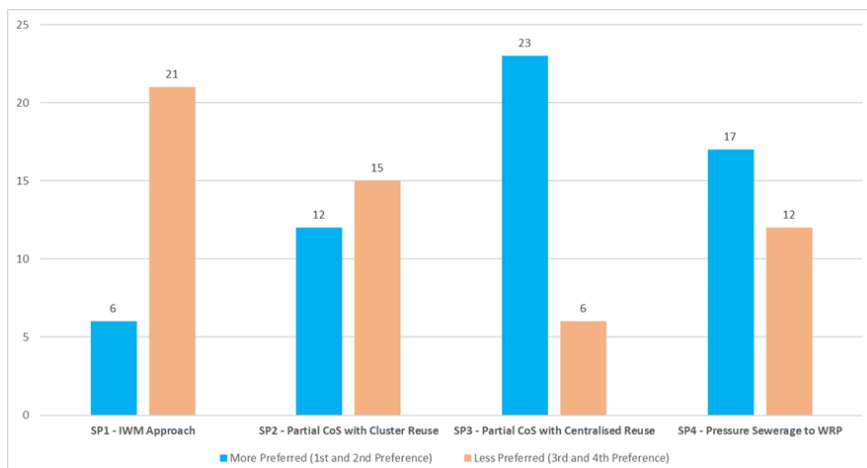
A preferred Solution Package was identified via both the MCA process and strong support from the community following consultation in 2018. This Solution Package involves a combination of innovative on-property and off-property water reuse in an Integrated Water Management (IWM) manner. Water would be treated and reused on-lot for garden and lawn irrigation with excess (not able to be sustainably utilised) directed to a local centralised reuse site for further treatment and irrigation of pasture / non-edible crops.

This preferred Solution has now been taken forward by Barwon Water and Council for Business Case development to help obtain necessary funding to make it happen. At this stage the current cost estimates are below.

Investigations and Consultation

- Existing system audits
- Data collection and water quality monitoring
- Site and soil investigations
- Extensive community consultation throughout
- Solution Development
- Cost estimates
- Multi Criteria Analysis

Estimated Capital Cost	Estimated Lifecycle Cost (NPV)
\$10.1M / \$70,200 per lot	\$12.3M / \$85,500 per lot



Appendix E Risk Based Prioritisation

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Prioritisation																	
<div>DWC</div> <div>DECENTRALISED WATER CONSULTING</div>		Sustainability of On-site Wastewater Management						Existing System Performance Issues			Legacy System Issues			Receiving Water Sensitivity			
		Properties that are too small to contain on-site			Land capability hazard for on-site containment			% Major / Critical Non-Compliance	No. of Major / Critical Non-Compliance	Sub-score				Comment	Sub-score		
		% Non CoS	No. of Non CoS	Sub-score	Ave. CoS Hazard Class	Ave. Final Risk / Hazard Score	Sub-score										
				1-5			1-5			1-5	1-5				1-5	Combined Score	FINAL RANK
				1			1			1			1		1		
	Village / Township																
	Penshurst	46%	167	5	2.6 (Cos High)	0.47	4	13%	27	4	6%	11	4	Groundwater pollution hazard due to soil and hydrogeology	5	22	2
	Glenthompson	48%	59	4	2.2 (Cos Very High)	0.4	5	33%	28	5	11%	9	4	Yuppeckiar Creek through township	5	23	1
	Balmoral	43%	67	4	2.5 (Cos High)	0.48	4	17%	14	3	6%	5	3	Gleneleg River & Mathers Creek adjacent to township	5	19	3
	Cavendish	15%	22	2	3.5 (CoS Medium)	0.42	3	14%	10	3	1%	1	1	Wannon River through township (town drains directly to WC)	5	14	6
	Branxholme	19%	29	2	3.4 (CoS High)	0.26	2	23%	17	4	12%	9	4	Arrandoovong Creek through township	5	17	5
	Tarrington	18%	13	1	3.9 (CoS Medium)	0.05	1							Intermittent creeks around township	2	4	7
	Hamilton - Hiller Lane	71%	10	4	1.9 (Cos Very High)	0	5	50%	7	4	50%	7	4	No WC's in close proximity	1	18	4
											Includes serious failing systems						

Appendix F Potential On-site System Risk and Management Hazard Methodology

This appendix includes details for a potential methodology for developing an onsite system 'Management' Hazard Class and final 'Domestic Wastewater Management' Class for the entire Shire. This is based on combining the Land Capability Hazard mapping class with a separate 'Management' hazard class based on the Existing On-site System (inspection data) for each property. This overall 'Domestic Wastewater Management' (DWM) Hazard Class would ultimately dictate the inspection frequency for each property and the time allowance for ensuring compliance issues (if any) are addressed and rectified.

The potential DWM / Management Risk Class is summarised in the table below for feedback from Council.

The intention would be for SGSC to develop a consistent, clearly defined set of criteria for what constitutes as minor, moderate, major and critical non-compliance from the on-site system inspection data.

Where on-site system inspection data is not available, some additional criteria may include;

- Systems older than 30 years - automatic major non-compliance until inspected
- Systems 10-30 years old - automatic moderate non-compliance until inspected
- Systems <10 years old - automatic low risk (Management) until inspected

Another aspect for consideration is a potential reduction in the assigned Land Capability Hazard for a property based on inspection information. For example, following an inspection it may be determined that the existing on-site system achieves all minimum setbacks to sensitive environmental receptors and therefore the onsite hazard is being adequately managed.

Domestic Wastewater Management (DWM) Risk Map / Class*Land Capability Hazard + Existing On-site System Hazard = DWM Risk Class*

DWM Risk Class	Description	Land Capability Hazard Class	Management Class	Inspection Frequency	Indicative Timeframe for Rectification of Non-compliance
Low	Few or no constraints to sustainable on-site wastewater management. Traditional technology approaches, routine maintenance and 3-5 yearly oversight likely to be adequate to manage risk. No known off-site discharge or major - critical non-compliance.	Low	Low risk or minor non-compliance	5 Yearly	1 Year
		Medium	Low risk		
Medium	There may be some moderate to major constraints to sustainable on-site wastewater management that require consideration in the approval of new systems. Higher levels of treatment and land application may be required in addition to more frequent oversight (2-3 years). No known off-site discharge or major - critical non-compliance.	Low	Moderate non-compliance (no OSD)	3 Yearly	9 Months
		Medium	Low or Minor non-compliance		
		High	Low risk		
High	Property will either a) possess significant constraints to sustainable on-site wastewater management that require specialist land capability assessment and design to mitigate; or b) contain an existing on-site system that has a known non-compliance. No known off-site discharge (critical non-compliance).	Low	Major non-compliance (no OSD)	2 Yearly	6 Months
		Medium	Moderate or major non-compliance (No OSD)		
		High	Minor non-compliance (no OSD)		
Very High	Properties with a known off-site discharge (either a legacy system or discharge due to a critical non-compliance) or too small to be able contain wastewater on-site in the long-term. Rectification of non-compliance and/or provision of an alternative wastewater management service should be a priority.	Non CoS & Very High	All	1 Yearly	3 Months
		Medium	Major non-compliance (no OSD)		
		High	Known off-site discharge (legacy system or due to a critical non-compliance)		

OSD = Off Site Discharge

Appendix G Stakeholder Engagement Plan

G1 Purpose

This is a Stakeholder Engagement Plan (DWMP Engagement Plan) prepared to support the Southern Grampians Shire Council (SGSC) Domestic Wastewater Management Plan (DWMP). The purpose of this Plan is to identify the key stakeholders in relation to domestic wastewater management in Southern Grampians and develop an appropriate program to inform, consult and involve stakeholders in the implementation of the DWMP.

This DWMP Engagement Plan will need to be reviewed throughout DWMP implementation to ensure it remains applicable and appropriate as information on and understanding of domestic wastewater risks and actions increases.

The engagement plan is presented in Table 24. Reference has been made to the International Association of Public Participation (IAP²) Engagement Spectrum as a guide for the level of engagement proposed for each stakeholder group.

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Table 24 Southern Grampians DWMP Stakeholder Engagement Plan

Stakeholder	Role	Engagement Points	IAP2 Spectrum	Engagement Activities
Relevant Council staff	<ul style="list-style-type: none"> - Septic tank permitting and oversight - Development Planning - Customer Service 	<ul style="list-style-type: none"> - Staff training / understanding of DWMP - DWMP Risk mapping and classification - Minimum Standards for Permits - Information / data management 	<ul style="list-style-type: none"> - Collaboration 	<ul style="list-style-type: none"> - Procedure development - Training
IWM Forum	<ul style="list-style-type: none"> - IWM Implementation within region 	<ul style="list-style-type: none"> - Coordinate with Council on opportunities for IWM implementation as part of DWMP. 	<ul style="list-style-type: none"> - Collaboration 	<ul style="list-style-type: none"> - Attendance at meetings - Potential development of Pilot Project
Wannon Water and CMA	<ul style="list-style-type: none"> - Sewerage planning and delivery - Potable water catchment protection - IWM implementation 	<ul style="list-style-type: none"> - DWMP Actions for High Priority areas. - Pilot Project implementation - Referrals for Permits in potable catchments - IWM Forum activities 	<ul style="list-style-type: none"> - Collaboration 	<ul style="list-style-type: none"> - Procedure development - Potential development of Pilot Project - Collaborate on solutions for High Priority towns
EPA Victoria	<ul style="list-style-type: none"> - Oversight of EP Act and SEPP (Waters) implementation. - Approval and regulation of systems >5,000 L/day 	<ul style="list-style-type: none"> - DWMP implementation progress - Referrals for >5,000 L/day systems 	<ul style="list-style-type: none"> - Consult 	<ul style="list-style-type: none"> - 6-monthly meetings - Procedure development
Other Councils	<ul style="list-style-type: none"> - DWMP implementation in adjacent areas 	<ul style="list-style-type: none"> - Coordination and sharing on DWMP implementation 	<ul style="list-style-type: none"> - Consult - Collaborate? 	<ul style="list-style-type: none"> - Quarterly meeting - Information sharing
DELWP	<ul style="list-style-type: none"> - Country towns water supply and sewerage. 	<ul style="list-style-type: none"> - DWMP implementation progress 	<ul style="list-style-type: none"> - Consult 	<ul style="list-style-type: none"> - 6-monthly meetings (with EPA?)
Land Capability Assessors / Designers	<ul style="list-style-type: none"> - LCAs and design reports for Permit applications to install or alter Septic Systems. 	<ul style="list-style-type: none"> - Understanding of DWMP Actions - Risk mapping and classification 	<ul style="list-style-type: none"> - Consult 	<ul style="list-style-type: none"> - Training
System installers and service agents	<ul style="list-style-type: none"> - Installation, rectification and alteration of systems. - Servicing and maintenance 	<ul style="list-style-type: none"> - Minimum Standards and Useable Land - Inspection and oversight program 	<ul style="list-style-type: none"> - Collaborate? 	<ul style="list-style-type: none"> - 3-6 monthly meetings? - Reference site visits?
Unsewered property owners	<ul style="list-style-type: none"> - Operation and performance of their on-site system. - Obtaining planning or Septic Tank Permits as necessary. 	<ul style="list-style-type: none"> - Understanding their on-site system - Take home DWMP outcomes and what they mean for them. 	<ul style="list-style-type: none"> - Consult 	<ul style="list-style-type: none"> - Education material / newsletter - Online / written surveys - Drop in sessions / pop ups - On-site inspections / meetings
General community	<ul style="list-style-type: none"> - Be aware of general risks and system functions 	<ul style="list-style-type: none"> - General education on DWM. 	<ul style="list-style-type: none"> - Inform 	<ul style="list-style-type: none"> - Education material / newsletter



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